Plaintiffs commenced this action to challenge a New York City policy regarding affordable housing lotteries. The City's policy allocates 50% of units in affordable housing lotteries to individuals who already reside in the community district where the new affordable housing units are located. This policy is referred to herein as the "Community Preference Policy." Plaintiffs allege that the Community Preference Policy violates the federal Fair Housing Act ("FHA"), 42 U.S.C. § 3604 *et seq.*, and the New York City Human Rights Law ("NYCHRL"), NYC Admin. Code § 8-107, *et seq.*, because it perpetuates racial segregation and disparately impacts racial minorities. They also claim that the City's decision to establish, expand, and maintain the policy constitutes intentional discrimination.

Currently pending before this Court is Plaintiffs' motion challenging privilege designations on 500 documents in the City's privilege log. The City asserts that the documents are protected from disclosure based on one or more of the following reasons: (1) attorney-client privilege, (2) work product protection, (3) deliberative process privilege, and (4)

legislative privilege. This Court assumes the reader's familiarity with the factual background of this case based on its many decisions in this action and does not repeat it here. *See Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 5664852, at *1-6 (S.D.N.Y. Nov. 27, 2017); *Winfield v. City of New York*, No. 15-cv-5236 (LTS) (DCF), 2016 WL 6208564, at *1-3 (S.D.N.Y. Oct. 24, 2016); *see also Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 2880556, at *1-2 (S.D.N.Y. July 5, 2017), objections overruled by, 2017 WL 5054727, at *1-2 (S.D.N.Y. Nov. 2, 2017).

The City submitted for *in camera* review a detailed privilege log with hyperlinks to all 500 documents and, in some cases, cover emails for the documents. The City also submitted a series of letters at this Court's request providing greater detail as to the basis for the assertion of privilege as to certain documents and categories of documents. In addition, after questions by the Court as to certain documents, the City withdrew its privilege designations and elected to produce these documents.¹

In addition, the Court is in receipt of the ruling of the Honorable Laura Taylor Swain dated December 12, 2018 setting aside this Court's February 2018 Order insofar as it addressed claims of deliberative process privilege. *See* ECF Nos. 259, 655. This Court has, consistent with Judge Swain's ruling, evaluated the City's claims of deliberative process privilege and whether disclosure is warranted under the factors set forth in *Rodriguez v. Pataki*, 280 F. Supp.2d 89, 99-

¹ The documents the City has decided to produce are identified on the privilege log in column A as numbers: 1, 5, 13, 14, 24, 65, 66, 72, 74, 75, 95, 106, 107, 108, 119, 124, 125, 130, 147, 233, 255, 303, 307, 328, 333, 341, 345, 353, 354, 360, 362, 372, 373, 374, 376, 378, 380, 382, and 499. Certain of these documents will be produced in redacted format.

101 (S.D.N.Y. 2003), in the manner prescribed by Judge Swain. This Court has adopted the same methodology for evaluating whether documents subject to the legislative privilege should nevertheless be produced pursuant to the *Rodriguez* balancing factors. Because this Court has previously set forth the standards governing applicability of the attorney-client privilege and work product privilege, it does not repeat them in detail here and refers the parties to the Court's prior decision. *See* ECF No. 259.

The Court has carefully reviewed all of the submissions by the parties and all 500 documents. In the interest of brevity and expediency, the Court does not discuss its reasoning as to each of the 500 documents here. Instead, the Court discusses treatment of certain categories of documents and provides an annotated spreadsheet providing additional information about each document and its rulings as to each.

Discussion

I. Attorney-Client Privilege

The attorney-client privilege "exists for the purpose of encouraging full and truthful communications between an attorney and his client and 'recognizes that sound legal advice or advocacy serves public ends and that such advice or advocacy depends upon the lawyer's being fully informed by the client." *In re Von Bulow*, 828 F.2d 94, 100 (2d Cir. 1987) (quoting *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981)). The party seeking to invoke the privilege bears the burden of establishing its applicability. *In re Cty. of Erie*, 473 F.3d 413, 418 (2d Cir. 2007). To do this, the governmental party claiming attorney-client privilege must establish: (1) a communication between government counsel and their clients, (2) that was intended to be and

was in fact kept confidential, and (3) was made for the purpose of obtaining or providing legal advice. *See id.* at 419 (internal citation omitted). As to factor 3, the key inquiry is whether the "predominant purpose" of the communication is to solicit or provide legal advice. *Id.* at 419-20 (collecting cases). When legal advice is the predominant purpose, "other 'considerations and caveats' are not severable and the entire communication is privileged." *Fox News Network, LLC v. US Dep't of Treasury*, 739 F. Supp. 2d 515, 560 (citing *In re Cty. of Erie*, 473 F.3d at 420). On the other hand, if the legal advice is merely "incidental to the nonlegal advice that is the predominant purpose of the communication," then the legal portions of the document may be redacted. *In re Cty. of Erie*, 473 F.3d at 420 n.8.

With these standards in mind, the following documents on the City's privilege log are protected by the attorney-client privilege: 3, 4, 18, 19, 22, 23, 25, 26², 27, 38, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 42, 44, 51, 53, 59, 60, 69, 70, 71, 80, 92, 93, 94, 96, 97, 98, 100, 109, 110, 113, 114, 120, 122, 123, 126, 136, 139, 140, 142, 159, 163, 175, 178, 190, 193, 194, 216, 218, 232, 235, 238, 239, 240, 241, 242,245, 248, 250, 251, 256, 266, 274, 275, 287, 288, 295, 298, 300, 306, 346, 349, 357, 359, 361, 363, 364, 470, 472, 476, 478, 480, 485. All of these documents involve communications and draft documents exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice. Because the attorney-client privilege applies, the Court does not need to reach any other privilege asserted. The following documents are not protected by the attorney-client privilege

² A substantial portion of the communications in this document are not privileged. The City shall produce a redacted version of this document redacting the limited portions that relate to topics on which legal advice is sought or given.

but, if subject to another privilege, are identified in the appropriate section below: 0, 4, 13, 43, 46, 95, 128, 130, 141, 165, 166, 176, 186, 233, 253, 254, 255, 260, 261, 263, 264, 265, 273, 279, 282, 284, 289, 291, 292, 293, 321, 342, 353, 360, 477, 499. These documents do not reflect communications or drafts exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice.

II. Work Product

The work product doctrine protects a broader category of documents and communications than the attorney-client privilege. Specifically, it protects documents and other tangible things "that are prepared in anticipation of litigation or for trial by or for a party or its representative." Fed. R. Civ. P. 26(b)(3)(A); see also Bowne of N.Y.C., Inc. v. AmBase Corp., 150 F.R.D. 465, 471 (S.D.N.Y. 1993). Documents "should be deemed prepared 'in anticipation of litigation' . . . if, 'in light of the nature of the document and the factual situation in the particular case, the document can fairly be said to have been prepared or obtained because of the prospect of litigation." United States v. Adlman, 134 F.3d 1194, 1202 (2d Cir. 1998) (emphasis in original) (internal citation omitted). "Where a document was created because of anticipated litigation, and would not have been prepared in substantially similar form but for the prospect of that litigation," it is protected as work product. Id. at 1195. "Conversely, protection will be withheld from 'documents that are prepared in the ordinary course of business or that would have been created in essentially similar form irrespective of litigation." Schaeffler v. United States, 806 F.3d 34, 43 (2d Cir. 2015) (quoting Adlman, 134 F.3d at 1202).

Work product protection, however, is not absolute. A party seeking discovery may overcome work product protection and obtain disclosure of material otherwise discoverable under Fed. R. Civ. P. 26(b)(1) by showing (1) substantial need for the material; and (2) an inability to obtain its substantial equivalent from another source without undue hardship. Fed. R. Civ. P. 26(b)(3)(A); *Obeid v. Mack,* No. 14-cv-6498 (LTS) (HBP), 2016 WL 7176653, at *5 (S.D.N.Y. Dec. 9, 2016). Although factual materials "may generally be discovered upon a showing of substantial need," *Obeid*, 2016 WL 7176653, at *5 (internal quotation marks and citations omitted), courts "must protect against disclosure of the mental impressions, conclusions, opinions, or legal theories of a party's attorney or other representative concerning the litigation." Fed. R. Civ. P. 26(b)(3)(B) (emphasis added). "Documents or portions of documents that qualify as 'opinion work product' are 'entitled to virtually absolute protection.'" *United States v. Mount Sinai Hosp.*, 185 F. Supp. 3d 383, 390 (S.D.N.Y. 2016) (quoting *United States v. Ghavami*, 882 F. Supp. 2d 532, 540 (S.D.N.Y. 2012)).

With these standards in mind, the following documents on the City's privilege log are protected by the work product doctrine: 6, 7, 8, 10, 11, 15, 16, 17, 47, 61, 76, 77, 78, 79, 81, 82, 85, 86, 89, 104, 118, 127, 129, 131, 133, 134, 135, 137, 138, 141, 149, 150, 151, 153-158, 160, 161, 162, 164, 165, 166, 167, 169, 170, 171, 172, 177, 182, 183, 184, 185, 188, 191, 192, 195-201-211, 220-230, 281, 366-371, 375, 377, 379, 381, 383-464, 466-469, 483, 484, 486-493, 498, 500. All of these documents were prepared in anticipation of this litigation or litigation with the U.S. Department of Housing and Urban Development ("HUD") and not in the normal course of business. Of these documents, a number contain mental impressions, analyses or studies,

conclusions, opinions, or legal theories of an attorney or other representative of the City concerning this litigation or potential litigation with HUD over the Community Preference Policy. A number of the documents were created solely for analyzing settlement positions. Having reviewed these documents, the Court finds there is no substantial need for the documents and, indeed, the vast majority reflect core work product that must be protected regardless under Federal Rule of Civil Procedure 26(b)(3). *See Adlman*, 134 F.3d at 1196 (The work product doctrine "is intended to preserve a zone of privacy in which a lawyer can prepare and develop legal theories and strategy with an eye toward litigation, free from unnecessary intrusion by his adversaries") (internal quotation marks omitted).

Additionally, with respect to documents reflecting settlement negotiations, proffers and strategy, the Court notes that such documents are inadmissible at trial under Federal Rule of Evidence 408 as evidence of the admission of the validity or invalidity of a claim. Fed. R. Evid. 408. The rationale behind the rule is that settlement proposals are irrelevant, as they "may be motivated by a desire for peace rather than from any concession of weakness of position" and "to promote settlement of disputes." 1972 Advisory Committee Notes to Rule 408; see also Fed. R. Civ. P. 68 (evidence of an unaccepted offer of judgment is not admissible as evidence of liability). Rule 408 does permit admission of information that would prove bias of a witness, negate a contention of undue delay, or prove an effort to obstruct a criminal investigation or prosecution. Fed. R. Evid. 408; 1972 Advisory Committee Notes to Rule 408. The 2006 Advisory Committee Notes to Rule 408 explicitly state that the rule "prohibits use of statements made in settlement negotiations to impeach by prior inconsistent statement or through contradiction."

2006 Advisory Committee Notes to Rule 408 (citing *EEOC v. Gear Petroleum, Inc.*, 948 F.2d 1542 (10th Cir. 1991) (letter sent as part of settlement negotiation cannot be used to impeach defense witnesses by way of contradiction or prior inconsistent statement; such broad impeachment would undermine the policy of encouraging uninhibited settlement negotiations)). Based on this Court's review of the documents concerning settlement, it is the Court's view that they could not be appropriately used for any permitted purpose under Federal Rule of Evidence 408. Therefore, they are protected from disclosure.

The following documents are not work product: 5, 24, 73, 106, 124, 125, 180, 181, 253, 254, 255, 260, 261, 328, 372, 373, 374, 376, 378, 380, 382, 499. The City acknowledged that some of these documents were not protected work product. Other documents include final versions (or portions thereof) of the City's consolidated plans concerning fair housing submitted to HUD and a factual communication to the Mayor about the filing of this litigation.

Accordingly, the City must produce these documents to the extent they are not protected by another privilege. To the extent any of these documents are also marked as being protected by the deliberative process or legislative privilege, they are addressed below.

III. Deliberative Process Privilege

The deliberative process privilege, also referred to as the executive privilege, protects "documents reflecting advisory opinions, recommendations and deliberations comprising part of a process by which governmental decisions and policies are formulated." *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 150 (1975) (internal quotation marks and citation omitted). It applies to both the ultimate decision-making executive and the executive's staff members. *See*

Hopkins v. H.U.D., 929 F.2d 81, 85 (2d Cir. 1991) (work product, opinions, and recommendations of staff are covered by the deliberative process privilege).

To be protected, the documents and communications used in the decision-making process must be both (1) pre-decisional and (2) deliberative. *Marisol A. v. Guiliani*, No. 95-cv-10533 (RJW), 1998 WL 132810, at *6 (S.D.N.Y. Mar. 23, 1998). This means the document must be prepared to aid the decisionmaker in arriving at a decision as opposed to communications that are part of routine agency self-evaluation. *See, e.g., Hopkins*, 929 F.2d at 84; *Marisol A.*, 1998 WL 132810, at *6; *Tigue v. U.S. Dep't of Justice*, 312 F.3d 70, 80 (2d Cir. 2002); *see also Charles v. City of New York*, No. 11-cv-0980 (KAM) (JO), 2011 WL 5838478, at *1 (E.D.N.Y. Nov. 18, 2011).

Even if a document is protected by the deliberative process privilege, a Court may order disclosure after balancing the following five factors and finding that they weigh in favor of disclosure: (i) the relevance of the evidence sought to be protected; (ii) the availability of other evidence; (iii) the 'seriousness' of the litigation and the issues involved; (iv) the role of the government in the litigation; and (v) the possibility of future timidity by government employees who will be forced to recognize that their secrets are violable. *See* ECF 655 (citing Rodriguez, 280 F. Supp. 2d at 99-101); *see also In re Delphi Corp.*, 276 F.R.D. 81, 85 (S.D.N.Y. 2011); *Five Borough Bicycle Club v. City of New York*, No. 07-cv-2448 (LAK), 2008 WL 4302696, at *1 (S.D.N.Y. Sept. 16, 2008).

With these standards in mind, the following documents on the City's privilege log are protected by the deliberative process privilege: 9, 12, 21, 34, 41, 45, 48, 52, 63, 68, 83, 84, 87,

88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 145, 146, 148, 152, 168, 174, 176, 187, 189, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 305, 308, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 351, 355, 358, 465, 473, 477, 494, 496, 497. All of these documents precede a policy or other decision by a City agency and reflect the deliberative process in reaching the decision. *See Marisol A.*, 1998 WL 132810, at *6. None appear to be routine self-evaluation. On the other hand, the following documents do not reflect any pre-decisional deliberative process and fall into the category of post-decision communications, post-decision strategy for implementation of decided policy, factual information or routine self-evaluation by an agency: 20, 54, 56, 57, 58, 64, 101, 111, 112, 144, 212, 213, 214, 247, 297, 304, 310, 313, 341, 343, 350, 356, 465, 471, 475, 479, 495. Thus, these documents are not protected by the deliberative process privilege and must be disclosed by the City.

With respect to those documents that are protected by the deliberative process privilege, the Court has applied the five-factor balancing analysis in the manner prescribe by Judge Swain in her December 12, 2018 decision and determined that the following documents need not be produced: 9, 21, 34, 41, 45, 48, 52, 63, 83, 84, 87, 88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 148, 152, 168, 174, 176, 187, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 308, 310, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 473, 477, 494, 496, 497. Many of these documents are drafts that are not

relevant or have marginal relevance and thus I give them little weight in the balancing test.

Likewise, the availability of a final policy and other information about a policy weighs against disclosure. When evaluating the first four factors together against the fifth *Rodriguez* factor, I find that the balance of factors weighs against disclosure of these documents.

On the other hand, the five-factor balancing analysis weighs in favor of disclosure as to the following documents: 12, 68, 145, 146, 189, 277, 305, 351, 355, 358. As to these documents, the relevance factor weighs heavily in favor of disclosure and outweighs the other factors, thereby requiring disclosure.

IV. Legislative Privilege

State and local legislators are entitled to absolute "immunity from liability for their legislative acts" as a matter of federal common law. *Supreme Ct. of Virginia v. Consumers Union of U.S. Inc.*, 446 U.S. 719, 732-33 (1980) (citing *Tenney v. Brandhove*, 341 U.S. 367, 379 (1951)); *Bogan v. Scott-Harris*, 523 U.S. 44, 48-49 (1988); *see also Rodriguez*, 280 F. Supp. 2d at 94-95. Courts within the Second Circuit have repeatedly held that state and local lawmakers are entitled to protection against discovery into their legislative acts in civil cases, explaining that such protection is needed to "shield legislators from civil proceedings which disrupt and question their performance of legislative duties to enable them to devote their best efforts and full attention to the public good." *See, e.g., Searingtown Corp. v. Inc. Vill. of N. Hills*, 575 F.

Supp. 1295, 1299 (E.D.N.Y. 1981) (precluding discovery into motivation of local legislators for rezoning decision that plaintiffs claimed violated their constitutional rights) (internal quotation marks and citations omitted); *ACORN v. Cty. of Nassau*, No. 05-cv-2301 (JFB) (WDW), 2007 WL

2815810, at *2 (E.D.N.Y. Sept. 25, 2007); see also In Vill. of Arlington Heights v. Metro. Hous.

Dev. Corp., 429 U.S. 252, 267-68 (1977) (recognizing in dicta that the common law legislative privilege also extends to protection from compelled testimony in civil cases); Star Distribs., Ltd. v. Marino, 613 F.2d 4, 6-9 (2d Cir. 1980).

Legislative acts that are protected under the privilege include any activity that is an integral part of the deliberative and communicative processes by which an individual considers whether to vote for or against a proposal. *See Eastland v. U.S. Servicemen's Fund,* 421 U.S. 491, 504 (1975); *Bogan*, 523 U.S. at 54-55. For example, legislative acts may include, but are not limited to: "delivering an opinion, uttering a speech, or haranguing in debate; proposing legislation; voting on legislation; making, publishing, presenting, and using legislative reports; authorizing investigations and issuing subpoenas; and holding hearings and introducing material at committee hearings." *S.E.C. v. Comm. On Ways and Means of the U.S. House of Representatives*, 161 F. Supp. 3d 199, 236 (S.D.N.Y. 2015) (citing *Fields v. Office of Eddie Bernice Johnson*, 459 F.3d 1, 10-11 (D.C. Cir. 2006)) (internal quotation marks omitted).

The legislative privilege also protects formal and informal fact and information-gathering activities about the subject of potential legislation, as well as documents regarding or reflecting the fruits of this research. *See id.* at 236-37, 245; *see also United States v. Biaggi*, 853 F.2d 89, 102-03 (2d Cir. 1988); *McSurely v. McClellan*, 553 F.2d 1277, 1286 (D.C. Cir. 1976) (en banc), *cert. dismissed* 438 U.S. 189 (1978). The privilege does not attach to activities concerning the administration of a law, speeches delivered outside of the legislative body and preparation for the same, the making of appointments with government agencies, and

newsletters and press releases to constituents. *See U.S. v. Brewster,* 408 U.S. 501, 512 (1972); *Hutchinson v. Proxmire*, 443 U.S. 111, 130-33 (1979).

Like the deliberative process privilege, the legislative privilege is qualified, and disclosure may be ordered subject to the same balancing factors applicable to the deliberative process privilege. *Rodriguez*, 280 F. Supp. 2d at 96; *see also Citizens Union of City of N.Y. v.*Att'y Gen. of N.Y., No. 16-cv-9592 (RMB) (KHP), 2017 WL 3836057, at *18 (S.D.N.Y. Sept. 1, 2017).

Applying these standards, this Court finds that none of the documents the City listed as protected by the legislative privilege in fact fall within the protection of this privilege. These documents are: 49, 55, 98, 99, 102, 179, 345. Thus, the City shall produce all of these documents.

Conclusion

The Court appends a spreadsheet reflecting the Court's rulings on the 500 documents. The Court also includes its own description of the documents in column R. The City is directed to re-review its privilege log consistent with this ruling and determine whether there are additional documents on its log that must be de-designated as privileged. The City shall complete this task by January 31, 2019 and provide Plaintiffs with an updated log and supplemental production by that date.

To the extent there are objections to this ruling, or Plaintiffs believe that the Court should re-evaluate the balance of *Rodriguez* factors or wish to make a substantial need argument as to a specific document protected by the work product doctrine, this Court

requests that the parties first file a motion for reconsideration with this Court. The parties shall

notify the Court by letter if they intend to request reconsideration of a ruling as to a particular

document by December 31, 2018. The Court will then set a briefing schedule as to any such

motion. To the extent the City does not dispute this Court's ruling with respect to documents

deemed non-privileged, it shall produce such documents by January 31, 2019.

SO ORDERED.

Dated: December 18, 2018

New York, New York

KATHARINE H. PARKER

United States Magistrate Judge

Kathaine H Parker

14

	Production				Court	Court's Summary
Sort	Beginning Bates	Control ID	Privilege(s)	Categorical Description	n Decisio	Description of Nature of Document
3011	Bates	CONTROLID	Frivilege(3)	Categorical Description	''	Document
0		NYCPRIVO 3014	Attorney Client;Deliberative	Draft Internal Memorandum re: AFFH and Community Preference	NP	communication among counsel and others re: delegation of responsibilities for responding to plaintiff's counsel letter re: fair housing policies
				Draft talking points re:		
1	NVC 0067300		Deliberative	421-a - Homeless Preference	NP	Dor Citula Agraement
1	NYC_0067299		Deliberative	Draft talking points re:	INP	Per City's Agreement
				421-a - Homeless		
2	NYC_0067300		Deliberative	Preference	NP	
3		NYCPRIVO 0004	Attorney Client	Email chain re: Application of Community Preference	AC	communication with counsel and others re: requests to include prior residents in community preference; identifying issue for legal advice
4		NYCPRIVO 0014	Attorney Client;Deliberative	Email chain re: Community Opposition Strategies	AC & DPP	communications with counsel and others about strategy and potential positions in advance of REBNY Meeting;
		NYCPRIV0		Email chain re: Litigation -		
5		0015	Work Product	Winfield Litigation	NP	Per City's Agreement
6		NYCPRIVO 0016	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	Settlement Options Analysis
7		NYCPRIVO 0017	Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP &	Settlement Options Analysis
8		NYCPRIVO 0018	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	Settlement Options Analysis
9		NYCPRIVO 0023	Deliberative	Draft Internal Memorandum re: 421-a - Homeless Preference	DPP	Draft decision memo to mayor regarding homeless unit commitment

	-	1		-	I	C
						Communication about
						preparation for legal
						strategy meeting with
		NYCPRIV0		Email chain re: Litigation -		Mayor about this
10		0025	Work Product	Winfield Litigation	WP	litigation
				Draft presentation re:		
				Litigation - Anticipated		
				Litigation re: Community		
		NYCPRIV0		Preference;Litigation -	WP &	Litigation Strategy
11		0026	Deliberative;Work Product	Winfield Litigation	DPP	Document
						communication regarding
						potential policy re: 421a
		NYCPRIVO		Email chain re: 421-a -		units; PRODUCE UNDER
12		0047	Deliberative	Homeless Preference	DPP	RODRIGUEZ
				Draft talking points re:		
				MIH - Anti-displacement		
		NYCPRIVO		strategies;Anti-		
12		0061	Attornov Client	_	NP	Par City's Agraamant
13		3001	Attorney Client	displacement strategies Draft talking points re:	INF	Per City's Agreement
				MIH - mobility;MIH -		
				· ·		
		NIV CDDIV (O		Community		
	NIV.C 0002074	NYCPRIVO	Baltha and a backdad a	opposition;MIH - City	NID	Des Citale Assessment
14	NYC_0083074	0063	Deliberative;Legislative	council input	NP	Per City's Agreement
		AUVCDDU VO		Escali de la compania del compania del compania de la compania del compania de la compania del compania de la compania del compania de la compania del compania del compania del la compania del compania		Communication about
45		NYCPRIVO	Maria Book at	Email chain re: Litigation -	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	work needed to inform
15		0067	Work Product	Winfield Litigation	WP	legal strategy
		AUVCDDU VO		Bush and a little line		
4.5		NYCPRIVO		Draft report re: Litigation -		
16		0068	Deliberative;Work Product	Winfield Litigation	WP	Litigation Strategy memo
				Doeft and the Litingtion		
				Draft report re: Litigation -		
		* IV (CD D IV (C		Winfield		
4-7		NYCPRIV0		Litigation; Application of	WP &	Settlement Options
17		0069	Deliberative;Work Product	Community Preference	DPP	Analysis
				Draft Internal		
				Memorandum re: MIH -		
				Anti-displacement		
				strategies; Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference; Litigation -		draft decision memo to
			Attorney	Winfield		mayor re: rezonings in
		NYCPRIV0	Client;Deliberative;Work	Litigation;Community		specific neighborhoods
18		0074	Product	Opposition Strategies	AC	containing legal advice
				Draft Internal		
				Memorandum re: MIH -		
				Anti-displacement		
				strategies; Litigation -		
				Anticipated Litigation re:		
				Community		
				la c		draft decision memo to
				Preference;Litigation -		drait decision memo to
			Attorney	Winfield		mayor re: rezonings in
		NYCPRIV0	Attorney Client;Deliberative;Work	-		
19	19	NYCPRIVO 0075		Winfield	AC	mayor re: rezonings in

	ı		П	T		
				Final talking points (non-		
				public) re: MIH - Anti-		internal documents
				displacement		setting forth admin.
		NYCPRIV0		strategies;MIH - City		position to certain issues;
20		0083	Deliberative;Legislative	council input	NP	shared with CM
			, 8	·		
						draft considerations for
						potential modification to
		AUVCDDU (O		Dog to a second or Malla City		•
		NYCPRIV0		Draft report re: MIH - City		MIH; DO NOT PRODUCE
21		0095	Deliberative;Legislative	council input	DPP	UNDER RODRIGUEZ
						Attorney comments on
						draft advertisement for
						housing on West 42nd St.
				Draft Document re: 421-a -		sent to another City
22	NIV.C 0022042		Aller Girer			
	NYC_0032942		Attorney Client	2015/2016 revision	AC	lawyer for further review
						communication with
						attorney and others
						concerning use of
						marketing bands for
						specific housing project;
		NYCPRIVO		Email chain re: Application		highlighting legal issues
22			Aller Gliere	Email chain re: Application		
23		0425	Attorney Client	of Community Preference	AC	with proposed approach
		NYCPRIV0		Email chain re: Litigation -		
24		0435	Work Product	Winfield Litigation	NP	Per City's Agreement
						draft language regarding
						housing ad sent to
		NYCPRIVO		Email chain re: Application		counsel for legal review
25				Email chain re: Application		_
25		0474	Attorney Client	of Community Preference	AC	and comment
						internal communications
						describing issue on which
						legal advice sought
						pertaining to lotteries can
						be redacted; document
		NIVCDDIVO		Empil obair ver 434	A C !::	otherwise must be
		NYCPRIV0			AC in	
26		2106	Attorney Client; Deliberative	Homeless Preference	part	produced
						communications with
						attorney and others
						concerning modifications
		NYCPRIV0		Email chain re: Application		to CPP in context of
27			Attornov Client Deliberation		۸,	
27		0482	Attorney Client; Deliberative	of Community Preference	AC	preservation projects
						communications with
						attorney and others
						concerning modifications
		NYCPRIV0		Email chain re: Application		to CPP in context of
28		0483	Attorney Client; Deliberative		AC	preservation projects
20		0403	Attorney chem, benderative		AC	
	NIVO COCCAS		A	Draft report re: 421-a -		attorney summary and
29	NYC_0033138		Attorney Client; Deliberative	2015/2016 revision	AC	advice re: 421-a

	1	1				Duett of decimand
						Draft of document
						concerning homeless
				Draft talking points re:		referrals to 421-a
		NYCPRIV0		421-a - Homeless		projects reflecting legal
30		0501	Attorney Client	Preference	AC	advice
				Email chain re: 421-a -		
				Homeless		communications
		NYCPRIV0		Preference; Application of		reflecting legal advice re:
31		2108	Attorney Client; Deliberative	Community Preference	AC	421-a
						Draft of documents
						concerning homeless
				Draft talking points re:		referrals to 421-a
		NYCPRIV0		421-a - Homeless		projects reflecting legal
32		0106	Attorney Client; Deliberative	Preference	AC	advice sought
			.,			emails with counsel and
						others; seeking legal
						advice in context of this
						litigation on
						communications plan re:
		NYCPRIVO		Email chain re: 421-a -		homeless referrals to 421-
22			Attaura Cliant Dalihantina		۸.	
33		0108	Attorney Client; Deliberative	Homeless Preference	AC	a projects
						der findere en en
						draft document
						containing comments re:
						homeless prevention
						policy and 421-a housing;
		NYCPRIVO		Draft Document re: 421-a -		DO NOT PRODUCE
34		0536	Deliberative	Homeless Preference	DPP	UNDER RODRIGUEZ
34			Deliberative		DPP	UNDER RODRIGUEZ Attorney draft of
34			Deliberative		DPP	UNDER RODRIGUEZ
34			Deliberative	Homeless Preference	DPP	UNDER RODRIGUEZ Attorney draft of
34		0536	Deliberative Attorney Client	Homeless Preference Draft talking points re:	DPP AC	UNDER RODRIGUEZ Attorney draft of documents discussing
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless Preference		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs Communications with
		0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs Communications with counsel and counsel's comments on draft FAQs
35		0536 NYCPRIVO	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to
35	NYC_0033169	0536 NYCPRIVO		Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference		UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs Communications with counsel and counsel's comments on draft FAQs
35		0536 NYCPRIVO	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a -	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects
35		0536 NYCPRIVO 0117	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with
35		NYCPRIVO 0117 NYCPRIVO	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to
35		0536 NYCPRIVO 0117	Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless	AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with
35		NYCPRIVO 0117 NYCPRIVO	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook
35		NYCPRIVO 0117 NYCPRIVO 0609	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with
35	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to to munications with counsel re: revisions to to munications with counsel re: revisions to
35	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609	Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421- a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook
35	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo
35	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Homeless Preference Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a -	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for
35	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611	Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re:
35	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO	Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for
35	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611	Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re:
35 36 37	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO	Attorney Client Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-
35 36 37	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO	Attorney Client Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-
35 36 37	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO	Attorney Client Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference	AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-a projects
35 36 37	NYC_0033169	NYCPRIVO 0117 NYCPRIVO 0609 NYCPRIVO 0611 NYCPRIVO 0613	Attorney Client Attorney Client Attorney Client Attorney Client	Draft talking points re: 421-a - Homeless Preference Draft talking points re: 421-a - Homeless Preference Email chain re: 421-a - Homeless Preference;Marketing guidelines Email chain re: 421-a - Homeless Preference Draft Document re: 421-a - Homeless Preference	AC AC AC	UNDER RODRIGUEZ Attorney draft of documents discussing homeless referrals to 421-a projecs Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects Communications with counsel re: revisions to Marketing Handbook Communications with counsel re: revisions to Marketing Handbook Attorney draft of memo sent to client for consideration re: homeless referrals to 421-a projects Attorney draft of report

					internal working draft
					reflecting tentative
					positions on HPD RFPs
			Draft Document re: Anti-		and involvement in
			displacement		neighborhood studies;
	NYCPRIVO		strategies;Community		DO NOT PRODUCE
41	2115	Deliberative	Opposition Strategies	DPP	UNDER RODRIGUEZ
					Draft memo re: 421-a for
	NYCPRIVO		Draft talking points re:		which legal review is
42	0637	Attorney Client	421-a - 2007 revision	AC	requested
		,			not conveying legal
	NYCPRIVO		Final letter (non-public) re:		advice or seeking legal
43	0644	Attorney Client		NP	advice
		,			Draft of Marketing
	NYCPRIVO		Draft Document re:		Guidelines containing
44	0665	Attorney Client; Deliberative	Marketing guidelines	AC	counsel's comments
		, ,	0.0		draft marketing
					guidelines to be
					submitted to legal for
					review and approval; DO
	NYCPRIV0		Draft Document re:		NOT PRODUCE UNDER
45	0666	Deliberative		DPP	RODRIGUEZ
13	0000	20	maneting gardenies	J	
			Email chain re: Anti-		communication with
			displacement		counsel and others re:
	NYCPRIVO		strategies;Application of		CPP; not seeking or
46	0668	Attorney Client	Community Preference	NP	reflecting legal advice
40	0000	recorney eneme	Community Preference		reneeting regar advice
			Draft letter re: Litigation -		
	NYCPRIVO			WP &	Draft letter to HUD re:
47	0676	Deliberative;Work Product	Community Preference	DPP	potential settlement
.,	0070				potential octarement
					draft strategy document
					concerning 10-year
					affordable housing plan
			Draft report re:		in East New York; DO
	NYCPRIVO		Application of Community		NOT PRODUCE UNDER
48	0686	Deliberative	Preference	DPP	RODRIGUEZ
					internal strategy
			Draft talking points re:		document regarding East
	NYCPRIV0		ENY - Anti-displacement		New York development
49	0768	Legislative		NP	issues
		-			not internal -
					communication with city
	NYCPRIVO		Email chain re: Application		counsel;
50	0782	Deliberative	of Community Preference	NP	,
			,		
					communication to
					counsel and others
					seeking advice re:
					overlapping preference
	NYCPRIV0		Email chain re: Application		categories at a specific
	0783	Attorney Client; Deliberative	of Community Preference	AC	development
51		III LEGITICY CHELL, DELIBERATIVE	To Community Fictorial		ac + Clopillelit

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52	NY0 078	CPRIVO 38	Deliberative;Legislative	Draft presentation re: Anti- displacement strategies	DPP	draft internal presentation concerning legislative agenda, positions on 421-a and fall back positions on rent regulation and land tax; DO NOT PRODUCE UNDER RODRIGUEZ
53	NYC 079	CPRIVO 93	Attorney Client;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	AC	communication discussing legal position in response to litigation and upcoming meeting with counsel
54	NY0 079	CPRIVO 99	Deliberative;Legislative	Draft Document re: ENY - Anti-displacement strategies	NP	draft executive summary of affordable housing plan for East New York
55	NYC 082	CPRIVO 27	Legislative	Draft talking points re: Anti- displacement strategies	NP	internal memo re: proposed responses to tenant harassment proposals by progressive caucus
56	NYC 015	CPRIVO 58	Deliberative;Legislative	Email chain re: Anti- displacement strategies	NP	also concerns bill re: harassment of tenants
57	NYC 083	CPRIVO 35	Deliberative;Legislative	Draft talking points re: ENY - Anti-displacement strategies	NP	internal memo reflecting decisionmaking re: issues to address re: East New York development
58	NYC 015	CPRIVO 59	Deliberative	Email chain re: ENY - Anti- displacement strategies;Community Opposition Strategies	NP	internal communications re: East New York development and MIH strategy
59	NY0 083	CPRIVO 39	Attorney Client;Work Product	Email chain re: Litigation - Other;AFFH and Community Preference	AC	document summarizes and conveys legal advice re: Consolidated Plan and ongoing litigation
60	NYC 084	CPRIVO 42	Attorney Client;Work Product	Email chain re: Litigation - Other;AFFH and Community Preference	AC	communication with counsel re: draft 2012 Consolidated Plan to HUD re: AFFH
61	NY0 084	CPRIVO 14	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Draft response to HUD draft langauge for
62	NY0 084	CPRIVO 46	Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	DPP	including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ

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				Draft Document re: Anti-		
				displacement		
		NYCPRIV0		strategies;Community		
63		2140	Deliberative	Opposition Strategies	DPP	same as 41
				Draft Document re: MIH -		
				Anti-displacement		
				strategies; ENY - Anti-		internal outline of
				displacement		remaining considerations
		NYCPRIVO		strategies;ENY - City		regarding East New York
64		0881	Dolihorativo I ogislativo		NP	development plan;
04		0001	Deliberative;Legislative	council input	INP	development plan,
		NIVCDDIVO		Draft ranget ray Anti		
		NYCPRIV0	S 111 1	Draft report re: Anti-		
65		0889	Deliberative;Legislative	displacement strategies	NP	Per City's Agreement
		NYCPRIV0		Email chain re: Anti-		
66		0891	Deliberative;Legislative	displacement strategies	NP	Per City's Agreement
				Final presentation (non-		
		NYCPRIVO		public) re: MIH - Anti-		
67		0904	Deliberative	displacement strategies	NP	
						internal communications
						concerning East New york
						development positions;
		NYCPRIVO		Email chain re: ENY - Anti-		PRODUCE UNDER
68		0163	Deliberative		DPP	RODRIGUEZ
00		0103	Deliberative	displacement strategies	DPP	RODRIGUEZ
						communication with
						counsel and others re:
						legal requirements of 421-
						a and applicability of
		NYCPRIV0		Email chain re: Application		various regulations to
69		0690	Attorney Client	of Community Preference	AC	specific development
				Email chain re: 421-a -		
		NYCPRIV0		2015/2016 revision;421-a -		
70		0972	Attorney Client; Deliberative	Homeless Preference	AC	Legal advice re: 421-a
				Draft Document re: 421-a -		
		NYCPRIVO		2015/2016 revision;421-a -		
71		0973	Attorney Client; Deliberative	Homeless Preference	AC	Legal advice re: 421-a
			, , , , , , , , , , , , , , , , , , , ,	Draft talking points re:		<u> </u>
		NYCPRIVO		Application of Community		
72		2768	Deliberative	Preference	NP	Per City's Agreement
, _						2.17 2.18.00
				Final letter (non-public) re:		
				Litigation - Anticipated		
		NYCPRIVO				Latter to HID providing
			Monte Droderst	Litigation re: Community	NID	Letter to HUD providing
73		2163	Work Product	Preference	NP	fact information
				Droft tolling raists		
				Draft talking points re:		
				Litigation - Winfield		
		NYCPRIV0		Litigation;Application of		
		1425	Deliberative	Community Preference	NP	Per City's Agreement
74		1425	Deliberative	Community i reference	141	I CI CITY 3 AGICCIIICIT

	1			T	I	I I
				Draft talking points re:		
				Litigation - Winfield		
		NYCPRIVO		Litigation;Application of		
75		1426	Deliberative	Community Preference	NP	Per City's Agreement
76		NYCPRIVO 0699	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications re: data analysis needed to determine potential settlement positions with HUD on CPP
77		NYCPRIVO 0701	Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Communications concerning draft letter to HUD and alteneratives to CPP
78		0701	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP &	Draft analysis of measures of demographics within CDs in connection with HUD submission
79		NYCPRIVO 0708	Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference	WP	internal statistical analysis for informing litigation strategy
80		NYCPRIVO 0709	Attorney Client;Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	AC	Discloses topic of legal advice and responses to Plaintiffs' counsel and draft communication to HUD
81		NYCPRIVO 0719	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP &	analysis to inform legal strategy
82		NYCPRIVO 0720	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications re: data analysis needed to determine potential settlement positions with HUD on CPP
83		NYCPRIVO 0724	Deliberative	Internal Charts or Maps;Notes re: Anti- displacement strategies	DPP	CHART RE: PROGRESS ON VARIOUS STRATEGIC PRESERVATION INITIATIVES, REFLECTS INTERNAL WORKING PROCESS; DO NOT PRODUCE UNDER RODRIGUEZ
84		NYCPRIVO 0731	Deliberative	Draft presentation re:	DPP	SAME AS 52

				Draft report re: Litigation - Anticipated Litigation re:		Settlement analysis for
				Community		considering options for
		NYCPRIV0		Preference;Litigation -		CPP changes in
85		0145	Work Product	Winfield Litigation	WP	connection with litigation
86		NYCPRIVO 0146	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP &	analysis prepared to inform litigation strategy and settlement
87		NYCPRIVO 0742	Deliberative;Work Product(withdrawn)	Draft report re: Litigation - Anticipated Litigation re: Community Preference	DPP	Work product withdrawn; draft report re: MIH policy reflecting input from various individuals; precedes counsel vote on MIH; DO NOT PRODUCE UNDER RODRIGUEZ
_		-	,	,		draft marketing
						guidelines to be
						submitted to legal for
						review and approval; DO
		NYCPRIVO		Draft Document re:		NOT PRODUCE UNDER
88		0752	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
				Internal Charts or Maps re:		
		NYCPRIV0		Litigation - Winfield	WP &	analysis to inform legal
89		0150	Deliberative;Work Product	Litigation	DPP	strategy and settlement
						draft marketing
						guidelines to be
						submitted to legal for
						review and approval; DO
		NYCPRIV0		Draft Document re:		NOT PRODUCE UNDER
90		0994	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
						draft marketing
						guidelines to be submitted to legal for
						review and approval; DO
		NYCPRIVO		Draft Document re:		NOT PRODUCE UNDER
91	NYC_0076061	0997	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
31				The state of the s		communications re:
						sections of 2016
						Marketing Guidelines and
		NYCPRIV0		Draft Document re:		attorney advice re:
92		0999	Attorney Client; Deliberative	Marketing guidelines	AC	certain sections
						communications with
						counsel and others re:
						inclusion of prior
		NIVCDDIVO		Empil phoin was Assaliantis		residents in community
03		NYCPRIVO	Attornou Cliant Daliharati	Email chain re: Application	۸.	preference for various
93		1000	Attorney Client; Deliberative	of Community Preference	AC	projects

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94	NYCPRIVO 1003 NYCPRIVO	Attorney Client	Email chain re: North Brooklyn Rezoning and Demographics Email chain re: MIH - Anti- displacement strategies;MIH -	AC	communications with counsel re: requests to include prior residents in community preference, pre-policy discussion re: policy
95	2149	Attorney Client; Deliberative		NP	Per City's Agreement
96	NYCPRIVO 1431	Attorney Client;Legislative	Email chain re: City Council Input;Application of	AC	communications discussing advice of counsel re: community preference with regard to specific project
97	NYCPRIVO 2174	Attorney Client;Deliberative;Legislative	Draft report re: MIH - Anti- displacement strategies;MIH - Community opposition;MIH - City council input;Community Opposition Strategies	AC	draft internal report concerning MIH and 421- a sent to counsel for legal comment
98	NYCPRIVO 1438	Legislative	Email chain re: Application of Community Preference	NP	communications about AMI and CPP as to specific development
99	NYCPRIVO 1439	Legislative	Email chain re: Application of Community Preference	NP	communications about AMI and CPP as to specific development
100	NYCPRIVO 1441	Attorney Client;Deliberative	Draft Document re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
101	NYCPRIVO 2175	Deliberative	Email chain re: Application of Community Preference	NP	communications regarding CPP
102	NYCPRIVO 1442	Legislative	Email chain re: Application of Community Preference	NP	communications about Bronx Commons development draft decision memo to
103	NYCPRIVO 0180	Deliberative	Internal Memorandum re: 421-a - Homeless Preference	DPP	mayor re: homeless unit commitment; DO NOT PRODUCE UNDER RODRIGUEZ
104	NYCPRIVO 0189	Deliberative;Work Product	Email chain re: Antidisplacement strategies; Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications concerning information needed to evaluate changes to CPP and settlement position with HUD

	N'	IYCPRIVO		Draft report re: MIH -		
105		191	Deliberative	mobility	DPP	SAME AS 87
103		131	Democrative	mosmey	D11	3711712 713 07
				Email chain re: Litigation -		
	N'	YCPRIV0		Anticipated Litigation re:		
106	15	510	Deliberative;Work Product	Community Preference	NP	Per City's Agreement
	N'	IYCPRIV0		Draft talking points re: Anti-		
107	15	511	Deliberative	displacement strategies	NP	Per City's Agreement
				Email chain re: Anti-		
				displacement		
		YCPRIV0		strategies;Application of		
108	15	540	Deliberative	Community Preference	NP	Per City's Agreement
				Internal Managandum re-		Draft decision memo on
	NI'	VCDDIVO		Internal Memorandum re: Commitment to Fair		MIH and stating
100		IYCPRIV0 549	Attornoy Client Deliberative		AC	understanding of legal advice
109	15	549	Attorney Client; Deliberative	Housing	AC	auvice
				Draft Internal		
				Memorandum re: MIH -		
				Anti-displacement		draft decision memo to
			Attorney	strategies; Litigation -		mayor on creation of MIH
	N'	YCPRIV0	, Client;Deliberative;Work	Anticipated Litigation re:		program containing and
110	15	556	Product	Community Preference	AC	seeking legal advice
						communication regarding
	N'	YCPRIV0		Email chain re: Application		inquiry about application
111	15	578	Deliberative;Legislative	of Community Preference	NP	of CPP
						communication regarding
		IYCPRIVO		Email chain re: Application		inquiry about application
112	15	584	Deliberative;Legislative	of Community Preference	NP	of CPP
				Formil about the CANY Austi		communication with
				Email chain re: ENY - Anti-		counsel re: legal advice
	NI	YCPRIVO		displacement strategies; Application of		on language in draft document concerning
113		591	Attorney Client; Deliberative	Community Preference	AC	CPP
113	1.	JJ1	Accorney chemi, Deliberative	Community reference	710	communication with
				Email chain re: ENY - Anti-		counsel re: legal advice
				displacement		on language in draft
	N'	YCPRIV0		strategies;Application of		document concerning
114		592	Attorney Client; Deliberative	Community Preference	AC	СРР
			, ,			
						draft decision memo to
				Draft Internal		mayor re: legal services
	N'	YCPRIV0		Memorandum re: Anti-		RFP; DO NOT PRODUCE
115	02	206	Deliberative	displacement strategies	DPP	UNDER RODRIGUEZ
				Draft presentation re: MIH		
				- Anti-displacement		
				strategies;MIH -		internal draft of
				Community		considerations for MIH
		IYCPRIVO	B. III	opposition;MIH - City		policy; DO NOT PRODUCE
116	16	617	Deliberative	council input	DPP	UNDER RODRIGUEZ

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117		NYCPRIVO 1620	Deliberative	Draft presentation re: MIH - Anti-displacement strategies; MIH - Community opposition; MIH - City council input	DPP	internal draft of considerations for MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ
118	NYC_0073100		Deliberative;Work Product	Email chain re: Litigation - Winfield Litigation	WP	Communications regarding this litigation and statement about it to provide to HUD
119		NYCPRIVO 0220	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	Per City's Agreement
120		NYCPRIVO 1659	Attorney Client; Deliberative	Draft talking points re: 421-a - Homeless Preference	AC	internal draft talking points in advance of meeting with REBNY containing attorney input and strategy
121		NYCPRIVO 1661	Deliberative	Email chain re: ENY - Anti- displacement strategies;Community Opposition Strategies	DPP	internal communications re: non-final talking points about non-final commitments in advance of release of Inwood Development Plan; DO NOT RELEASE UNDER RODRIGUEZ
122		NYCPRIVO 1662	Attorney Client	Email chain re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
123		NYCPRIVO 1663	Attorney Client	Email chain re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
124		NYCPRIVO 1666	Work Product		NP	Per City's Agreement
125		NYCPRIVO 1667	Deliberative;Work Product	Email chain re: Anti- displacement strategies; Litigation - Winfield Litigation	NP	Per City's Agreement
126		NYCPRIVO 1723	Attorney Client;Deliberative	Email chain re: Application of Community Preference	AC	communication with counsel and others seeking legal advice on homeless referrals to a specific project
127		NYCPRIVO 1026	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Discussion about how to conduct data analysis to answer HUD request

						email seeking legal
						advice, among other
	NYCP	PRIVO		Email chain re: Application		input, on a specific
128	1726		ey Client;Deliberative	of Community Preference	NP	application of CPP
129	NYCP 1034	PRIVO	rative;Work Product	Internal Charts or Maps re: Litigation - Anticipated	WP &	analysis to inform litigation strategy
130	NYCP 0237		ey Client;Deliberative	Email chain re: 421-a - Homeless Preference;Application of Community Preference	NP	Per City's Agreement
131	NYCP 1037		ative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	summary of info discussed at settlement meeting with HUD re: HUD data requests for alternative to CPP
132	NYCP 1737		rative;Legislative	Email chain re: ENY - Anti- displacement strategies Email chain re: Litigation -	DPP	internal communications re: East New York development and strategy; DO NOT PRODUCE UNDER RODRIGUEZ information and data collected to inform
	NYCP	RIVO Deliber	ative	Anticipated Litigation re:		settlement strategy with
133	1039		awn);Work Product	'	WP	HUD
134	NYCP 1058	PRIVO	rative;Work Product	Draft report re: Anti- displacement strategies; Litigation - Winfield Litigation	WP	Draft PPT re: alternatives to CPP to inform strategy in litigation
135	NYCF 1066		rative;Work Product	Internal Charts or Maps re: Anti-displacement strategies	WP	email re: gentrification map in connection with planning changes to CPP for settlement
126	NYCP 1067		ey Client;Deliberative	Draft report re: Marketing guidelines	AC	revisions to Marketing handbook sent to counsel for comment
136	NYCF 1070	PRIVO	rative;Work Product	Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation	WP &	gentrification map for planning changes to CPP for settlement
138	NYCP 1071		ative;Work Product	Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation	WP & DPP	gentrification map for planning changes to CPP for settlement
139	NYCP 1075		egislative;Work	Email chain re: City Council Input; Litigation - Anticipated Litigation re: Community Preference	AC	email chain with counsel and others re: response to Plaintiff's counsel and draft letter to HUD

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140	NYC_0076236	NYCPRIVO 1117 NYCPRIVO	Attorney Client;Deliberative;Work Product	Draft presentation re: Litigation - Anticipated Litigation re: Community Preference;Neighborhood Demographics Email chain re: Litigation - Anticipated Litigation re: Community Preference;AFFH and	AC WP &	document discussing strategies for negotiations with HUD re: community preference; legal advice on document sought ppt re: option for analyzing various aspects of CDs in connection with changes to CPP as part of
141		1122	Attorney Client; Work Product	Community Preference	DPP	litigation
142		NYCPRIVO 2150	Attorney Client	Email chain;Draft Document re: OTHER	AC	communications identifying portions of draft document where legal advice is sought and discussing legal review of same
143		NYCPRIVO 1222	Deliberative; Legislative	Email chain re: Anti- displacement strategies	DPP	internal communications re: East New York development and MIH strategy; DO NOT PRODUCE UNDER RODRIGUEZ
144		NYCPRIVO 1231	Deliberative	Email chain re: Anti- displacement strategies;Application of Community Preference	NP	email re: application of CPP
145		NYCPRIVO 1292	Deliberative	Email chain re: Community Opposition Strategies	DPP	communications concerning preliminary responses to community questions about Community Housing Plan - PRODUCE UNDER RODRIGUEZ
146		NYCPRIVO 1294	Deliberative	Notes re: Anti- displacement strategies;Commitment to Fair Housing	DPP	internal notes reflecting Meltzer's thoughts on contract with NEIGHBORHOOD PRESERVATION CONSULTANT program and displacement mitigation strategies - PRODUCE UNDER RODRIGUEZ
147		NYCPRIVO	Deliberative	Draft report re: ENY - Anti- displacement strategies;ENY - Community opposition	NP	Per City's Agreement

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					concept paper in advance
					of RFP for Neighborhood
					Preservation Consultant
					contract to assist HPD in
					preserving affordable
					housing stock; lays out
					goals, elements and
					parameters of new model
			Final report (non-		for program - not final
			public);Draft Document re:		parameters of program -
	NYCPRIVO		Anti-displacement		DO NOT PRODUCE
148	1302	Deliberative	strategies	DPP	UNDER RODRIGUEZ
					Concerns literature
					review on gentrification
	NYCPRIVO		Email chain re: Litigation -		and economic diversity;
149	2151	Work Product	Winfield Litigation	WP	FOR SETTLEMENT
143	2131	WorkTroddet	Willicia Litigation	VVI	TON SETTELIVILIA
					Settlement analysis for
			Internal Charte or Mane re-		-
	NIVCDD VC		Internal Charts or Maps re:		considering options for
	NYCPRIV0		Litigation - Winfield		CPP changes in
150	1342	Work Product	Litigation	WP	connection with litigation
					email discussion
					regarding options for
					changes to CPP in
	NYCPRIV0		Email chain re: Litigation -	WP &	connection with
151	1349	Deliberative;Work Product	Winfield Litigation	DPP	settlement positions
					communications setting
					forth preliminary
					thoughts about creation
					of HousingStat (a
					computer program to
					help officials and
					nonprofits prevent
					displacement and protect
					stock of affordable
	 				housing) - DO NOT
	NYCPRIV0		Email chain re: MIH - Anti-		PRODUCE UNDER
152	1353	Deliberative	displacement strategies	DPP	RODRIGUEZ
					email discussion re:
	NYCPRIV0		Email chain re: Litigation -	WP &	settlement posiitons on
153	1358	Deliberative;Work Product	Winfield Litigation	DPP	СРР
					Communication about
	NYCPRIVO		Email chain re: Litigation -		work needed to inform
154	2153	Work Product	Winfield Litigation	WP	legal strategy
			Notes re: Anti-		
			displacement strategies;		Summary of fact research
	NYCPRIVO		Litigation - Winfield		done for litigation and
155	2154	Work Product	Litigation	WP	reflects litigation strategy
133					email discussion re:
	NYCPRIVO		Email chain re: Litigation -	WP &	settlement positions on
156	1366	Deliberative;Work Product	Winfield Litigation	DPP	CPP
130	1300	Democrative, WORK FROUNCE	TTAINCIG EILIGALION	511	email discussion re:
	NYCPRIV0		Email chain roy Litigation	WP &	
4		Dolihorotive Ments Deviden	Email chain re: Litigation -		settlement positions on
157	1367	Deliberative;Work Product	Winfield Litigation	DPP	CPP

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				Email chain re: Litigation -		
				Anticipated Litigation re:		
				Community		email discussion re:
		NYCPRIVO		Preference;Litigation -	WP &	settlement positions on
158		1374	Deliberative;Work Product	Winfield Litigation	DPP	СРР
			,			communciations with
			Attorney	Email chain re: Litigation -		counsel and others re:
		NYCPRIVO	Client;Deliberative;Work	Anticipated Litigation re:		legal strategy and
159		1375	Product	Community Preference	AC	defenses
						Describes work done for
		NYCPRIVO		Email chain re: Litigation -		informing litigation and
160		1377	Work Product	Winfield Litigation	WP	settlement strategy
				Draft Internal		O,
				Memorandum re:		
		NYCPRIVO		Litigation - Winfield	WP &	legal materials re:
161		1378	Deliberative;Work Product	Litigation	DPP	settlement positions
			,	Draft Internal		
				Memorandum re:		
		NYCPRIVO		Litigation - Winfield	WP &	legal materials re:
162		1384	Deliberative;Work Product	Litigation	DPP	settlement positions
			,	Ü		'
						communications with
						counsel and others re:
		NYCPRIVO		Email chain re: Application		draft statement about
163		1746	Attorney Client	of Community Preference	AC	community preference
			,	,		, ,
		NYCPRIVO		Draft report re: Litigation -	WP &	legal materials re:
164		1386	Deliberative;Work Product	Winfield Litigation	DPP	settlement positions
			,	Internal Charts or Maps re:		·
		NYCPRIVO		Litigation - Winfield		legal materials re:
165		1392	Attorney Client; Work Product		WP	settlement positions
						·
		NYCPRIVO		Email chain re: Litigation -		legal materials re:
166		1398	Attorney Client; Work Product	Winfield Litigation	WP	settlement positions
						Describes work done for
		NYCPRIV0		Email chain re: Litigation -		informing litigation and
167		1399	Work Product	Winfield Litigation	WP	settlement strategy
						draft marketing
						guidelines to be
						submitted to legal for
						review and approval; DO
		NYCPRIV0		Draft Document re:		NOT PRODUCE UNDER
168		1752	Deliberative	Marketing guidelines	DPP	RODRIGUEZ
						communications
				Email chain re: Litigation -		concerning legislative
		NYCPRIV0		Anticipated Litigation re:		history of CPP and search
169		0245	Deliberative;Work Product	Community Preference	WP	for same
						communications
						concerning potential
						changes to CPP in context
						of settlement discussion
				Email chain re: Litigation -		with HUD; DO NOT
		NYCPRIVO		Anticipated Litigation re:	WP &	PRODUCE UNDER
170		0263	Deliberative;Work Product	Community Preference	DPP	RODRIGUEZ
لنـــــــــــا			·	·		1

			Internal Charts or Maps re:		
			Litigation - Anticipated		analysis to inform
	NYCPRIV0		Litigation re: Community	WP &	litigation strategy and
171	0264	Deliberative;Work Product	Preference	DPP	settlement
			Email chain re: Litigation -		communications
	NYCPRIV0		Anticipated Litigation re:		concerning letter to HUD
172	0265	Deliberative;Work Product	Community Preference	WP	re: alternatives to CPP
					communicatons
					concerning development
			Email chain re: City Council		at 168th St. and response
	NYCPRIVO		Input;Application of		to counsel member
173	1760	Deliberative;Legislative	Community Preference	NP	concerns
173	1700	Democrative, Legislative	Community Frenchice	141	Concerns
			Draft presentation re: Anti-		
	NYCPRIVO		displacement strategies;		
174	0274	Deliberative	421-a - 2015/2016 revision	DDD	Same as 52
1/4	02/4	Delinerative	421-a - 2013/2010 (EVISION	שרא	communication with
					counsel and others
					seeking advice on
					application of
	NYCPRIV0		Email chain re: Application		preferences at a specific
175	0278	Attorney Client	of Community Preference	AC	development
					Not attorney-client
					because sent to HUD;
					Letter from Been to HUD
			Final letter (non-public) re:		GC re: Settlement
		Attorney	Litigation - Anticipated		Proposal; DO NOT
	NYCPRIVO	Client;Deliberative;Work	Litigation re: Community		PRODUCE UNDER
176	0280	Product		DPP	RODRIGUEZ
			Internal Charts or Maps re:		
			Litigation - Anticipated		
			Litigation re: Community		analysis to inform
	NYCPRIVO		Preference;Litigation -	WP &	litigation strategy and
177	0281	Deliberative;Work Product	Winfield Litigation	DPP	settlement
1//	 0201	Democrative, WOIN FIDUALL	**************************************	011	Communication with
					counsel; discussion
			Email chain rev Litigation		· ·
			Email chain re: Litigation -		anticipated litigation,
			Anticipated Litigation re:		FOIL request and
	ana		Community		potential fact
	NYCPRIVO		, ,	AC &	development for
178	0292	Attorney Client; Work Product	Winfield Litigation	WP	litigation
					emails between
	NYCPRIV0		Email chain re: Application		Garodnick and Been re:
179	0293	Legislative	of Community Preference	NP	CPP
					draft communication to
	NYCPRIVO		Email chain re: Litigation -		mayor about filing of this
180	0295	Work Product	Winfield Litigation	NP	suit
			Email chain re: Litigation -		
			Anticipated Litigation re:		communications about
			Community		this litigation and
	NYCPRIVO		Preference;Litigation -		providing statement to
181	0306	Work Product	Winfield Litigation	WP	HUD re: same
				<u> </u>	

182		NYCPRIVO 0309	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
183		NYCPRIVO 0321	Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference	WP	Analysis of ACS demographic and housing estimates based on census tracts
184		NYCPRIVO 0322	Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP	Atty questions re: CPP and statistical tests
185	NYC_0072746	NYCPRIVO 0329	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP	Draft Letter from Been to HUD GC re: settlement
186		NYCPRIVO 1780	Attorney Client	Final report (non-public) re: Marketing guidelines	NP	
187		NYCPRIVO 1791	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
188		NYCPRIVO 0338	Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Internal communication regarding analysis of litigation risk and settlement possibility with HUD
189		NYCPRIVO 0339	Deliberative	Email chain re: Litigation - Anticipated Litigation re: Community Preference	DPP	communications about potential changes to CPP and communications with CM Greenfield - PRODUCE UNDER RODGRIGUEZ
190		NYCPRIVO 0340	Attorney Client	Email chain re: Application of Community Preference;Community Opposition Strategies	AC	communication with counsel and other seeking advice re: public statement about CPP
191		NYCPRIVO 0341	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Communications with HUD and then internal communications re: settlement discussions with HUD re: CPP
192		NYCPRIVO 0342	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communication concerning proposed communication with HUD re: alternatives to CPP

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						decision memo to Mayor
				Draft Internal		making
				Memorandum re: AFFH		recommendations and
				and Community		conveying legal advice re:
		NYCPRIV0		Preference;Community		rezoning in specific
193		0345	Attorney Client; Deliberative	Opposition Strategies	AC	neighborhood
						Decision memo to Mayor
				Internal Memorandum re:		re: rezoning in specific
		NYCPRIV0		Commitment to Fair		neighborhoods and
194		1835	Attorney Client; Deliberative	Housing	AC	containing legal advice
						Notes on property
				Final was and / a are resolution		Notes on property
		NYCPRIVO		Final report (non-public)		portfolios and includes
105			Mark Dradust	re: Litigation - Winfield	MD	Winfield litigation
195		1841	Work Product	Litigation Internal Charts or Maps re:	WP	strategy comments analysis to inform
		NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
106		0351	Dalibarative Work Bradust		DPP	settlement
196		0331	Deliberative;Work Product	Litigation	DPP	settlement
				Internal Charts or Maps re:		
				Litigation - Anticipated		
				Litigation re: Community		analysis to inform
		NYCPRIV0		Preference;Litigation -	WP &	litigation strategy and
197		0352	Deliberative;Work Product	Winfield Litigation	DPP	settlement
137		0332	Deliberative, Work Froduct	Draft presentation re:		Settlement
		NYCPRIV0		Litigation - Winfield		Legal communication and
198		0353	Work Product	Litigation	WP	analysis of case
						Notes concerning
				Notes re: 421-a -		considerations for
				2015/2016 revision;		determining policy
		NYCPRIVO		Litigation - Winfield	WP &	regarding 421a and
199		0354	Deliberative;Work Product	Litigation	DPP	changes to law
			·	Ü		list of questions to
		NYCPRIVO		Notes re: Litigation -		consider re: possible
200		0355	Deliberative;Work Product	Winfield Litigation	WP	changes to CPP
				Internal Charts or Maps re:		
				Litigation - Anticipated		
				Litigation re: Community		analysis to inform
		NYCPRIV0		Preference;Litigation -	WP &	litigation strategy and
201		0356	Deliberative;Work Product	Winfield Litigation	DPP	settlement
						internal draft re:
				Draft Internal		preservation initatives;
		NYCPRIVO		Memorandum re: Anti-		preservation initatives; DO NOT PRODUCE
202		NYCPRIVO 0363	Deliberative		DPP	preservation initatives;
202			Deliberative	Memorandum re: Anti- displacement strategies	DPP	preservation initatives; DO NOT PRODUCE
202			Deliberative	Memorandum re: Antidisplacement strategies Internal Charts or Maps re:	DPP	preservation initatives; DO NOT PRODUCE
202			Deliberative	Memorandum re: Antidisplacement strategies Internal Charts or Maps re: Litigation - Anticipated	DPP	preservation initatives; DO NOT PRODUCE UNDER RODRIGUEZ
202		0363	Deliberative	Memorandum re: Antidisplacement strategies Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community		preservation initatives; DO NOT PRODUCE UNDER RODRIGUEZ analysis to inform
202			Deliberative Deliberative;Work Product	Memorandum re: Antidisplacement strategies Internal Charts or Maps re: Litigation - Anticipated	DPP WP & DPP	preservation initatives; DO NOT PRODUCE UNDER RODRIGUEZ

204	NYCPRIVO 0368	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
	NYCPRIV0		Draft Internal Memorandum re: Litigation - Winfield		Legal analysis and
205	0378	Work Product	Litigation	WP	settlement strategies
206	NYCPRIVO 0379	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Setlement analysis for considering options for CPP changes in connection with litigation
207	NYCPRIVO 0380	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation
208	NYCPRIVO 0382	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation - MAP
209	NYCPRIVO 0391	Work Product	Draft presentation re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
210	NYCPRIVO 0392	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP	Draft Letter from Been to HUD GC re: settlement
211	NYCPRIVO 0393	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation - MAP
242	NYCPRIVO 0394	Daliharativa	Draft talking points re: 421-a - Homeless Preference	NP	draft internal Q&A re: 421a Homeless preference; contains
212	NYCPRIVO 0395	Deliberative Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	interpretation of 421a draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
214	NYCPRIVO 0396	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
215	NYCPRIVO 0402	Deliberative;Legislative	Draft talking points re: MIH - Anti-displacement strategies	DPP	same as 83
216	NYCPRIVO 1843	Attorney Client;Deliberative	Internal Memorandum re: 421-a - 2015/2016 revision	AC	legal summary for client re: 421-a

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				Draft report re: Application		draft section of marketing
				of Community		handbook; DO NOT
		NYCPRIV0		Preference;Marketing		PRODUCE UNDER
217		1850	Deliberative	guidelines	DPP	RODRIGEZ
218		NYCPRIVO 1855	Attorney Client;Deliberative	Internal Memorandum re: 421-a - Homeless Preference	AC	Memo reflecting opinions of HPD Legal Affairs and Law Department on tenant selection and requested for determining policy re: same
						draft Q&As re: affordable housing in connection
		NYCPRIV0		Draft talking points re: Anti-		with 2015 mayor state of
219		1863	Deliberative	displacement strategies	NP	city address
				Draft Document re-		
				Draft Document re: Litigation - Anticipated		
				Litigation - Anticipated Litigation re: Community		Draft questions for
				Preference; Litigation -		analysis for formulating
220	NYC 0067398		Work Product	Winfield Litigation	WP	litigation strategy
	_			Draft Internal		0 07
				Memorandum re:		analysis to inform
				Litigation - Winfield	WP &	litigation strategy and
221	NYC_0067400		Deliberative;Work Product	Litigation	DPP	settlement
				Draft Internal		
				Memorandum re:	W.D. 0	analysis to inform
222	NVC 0067402		Dalibarativa Wark Bradust		WP & DPP	litigation strategy and settlement
222	NYC_0067402		Deliberative;Work Product	Litigation Final presentation (non-	DFF	Settlement
				public) re: Litigation -		Legal communication and
223	NYC_0067405		Work Product	Winfield Litigation	WP	analysis of case
	_			Internal Charts or Maps re:		analysis to inform
				Litigation - Winfield	WP &	litigation strategy and
224	NYC_0067416		Deliberative;Work Product	Litigation	DPP	settlement
225	NYC_0067418		Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	analysis to inform litigation strategy and settlement
				Internal Charts or Maps re:		analysis to inform
					WP &	litigation strategy and
226	NYC_0067422		Deliberative;Work Product	Litigation	DPP	settlement
				Notes re: Litigation - Anticipated Litigation re:		notes reflect communications with HUD re: settlement of
227	NYC_0067424		Deliberative;Work Product	Community Preference	WP	issues raised about CPP
						Reflects attorney
				Notes revilitization		questions and
220	NVC 0067425		Work Product	Notes re: Litigation - Winfield Litigation	WP	information gathering for litigation
228	NYC_0067425		WOIK FIDUUCE	willield Litigation	VVF	Reflects potential
				Notes re: Litigation -		analyses for informing
229	NYC_0067426		Work Product	Winfield Litigation	WP	litigation strategy
		1		<u>. </u>		

				Draft procentation re-		Draft procentation re-
				Draft presentation re: Litigation - Winfield		Draft presentation re: litigation for informing
230	NYC 0067431		Work Product	Litigation	WP	litigation strategy
230	N1C_0007431		Work Floddet	Draft talking points re:	VVF	inigation strategy
				MIH - Community		
				opposition;Anti-		Notes for discussion with
				displacement		NYT about fair housing;
				strategies;Commitment to		does not reflect
221	NYC 0067438		Deliberative	Fair Housing	NP	decisionmaking on policy
231	N1C_0007438		Deliberative	rail flousing	INF	decisioninaking on policy
						Withdraw legislative
						privilege; adding DPP;
						communications with
						counsel and others to
						provide legal advice
						regarding proposed
						application of CPP to
		NYCPRIV0	Attorney Client; Legislative	Email chain re: Application		displaced tenants of
232		1867	(Withdrawn); Deliberative	of Community Preference	AC	Greenpoint/Wiliamsburg
232		1007	(vviendravvii), Beilberative	or community reference	7.0	Creenpointy Williamsburg
		NYCPRIVO		Draft report re: Application		
233		1874	Attorney Client; Deliberative	of Community Preference	NP	Per City's Agreement
			,	, , , , , , , , , , , , , , , , , , , ,		The state of the s
						draft of proposed new
						housing marketplace
		NYCPRIVO		Draft report re: Anti-		plan; DO NOT PRODUCE
234		1882	Deliberative	displacement strategies	DPP	UNDER RODRIGUEZ
						communications with
						counsel discussing
		NYCPRIV0		Email chain re: Application		potential legislation and
235		1884	Attorney Client	of Community Preference	AC	conveying legal advice
						draft language for
				Draft report re: Litigation -		including in AFFH
				Winfield		Consolidated Plan; DO
		NYCPRIV0		Litigation;Commitment to		NOT PRODUCE UNDER
236		2774	Deliberative	Fair Housing	DPP	RODRIGUEZ
				Draft rapart va. Litizatia		draft language for
				Draft report re: Litigation - Winfield		including in AFFH
		NYCPRIVO				Consolidated Plan; DO NOT PRODUCE UNDER
237		2775	Deliberative	Litigation; Commitment to Fair Housing	DPP	RODRIGUEZ
257		2113	Democrative	I all Housing	DF F	draft of 2016
				Draft report re:		consolidated plan re:
		NYCPRIVO		Commitment to Fair	AC &	AFFH sent to counsel for
238		2782	Attorney Client; Deliberative	Housing	DPP	comments
			-,,	- 0		draft of 2016
				Draft report re:		consolidated plan re:
		NYCPRIVO		Commitment to Fair	AC &	AFFH sent to counsel for
239		2783	Attorney Client; Deliberative	Housing	DPP	comments
						draft of 2016
		NYCPRIV0		Draft report re: AFFH and	AC &	consolidated plan re:
240		2784	Attorney Client; Deliberative	Community Preference	DPP	AFFH sent to counsel for
				Draft report re: AFFH and		doanfitroefr2t016
				Community		consolidated plan re:
		NYCPRIV0		Preference;Commitment	AC &	AFFH sent to counsel for
241		2785	Attorney Client; Deliberative	to Fair Housing	DPP	comments

		1				
				Draft report re: Anti-		draft of 2016
				displacement		
				'		consolidated plan
		NYCPRIVO		•	AC &	sections re: AFFH sent to
242	2	2797	Attorney Client; Deliberative	Fair Housing	DPP	counsel for comments
						draft langauge for
				Draft report re: Anti-		including in AFFH
				displacement		Consolidated Plan; DO
	N	NYCPRIVO		strategies;Commitment to		NOT PRODUCE UNDER
243	2	2800	Deliberative	Fair Housing	DPP	RODRIGUEZ
244		NYCPRIVO 2807	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for Fair Housing Statement to be included in AFFH Plan; DO NOT PRODUCE UNDER RODRIGUEZ
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments from multiple
	N	NYCPRIVO		Commitment to Fair	AC &	agencies to submit to
245	2	2812	Attorney Client; Deliberative	Housing	DPP	legal
			•			draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
	N	NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
246		2825	Deliberative	Housing	DPP	RODRIGUEZ
2.10		.023	Democrative	Trousing	J11	email re: language for
						inclusion in AFFH
				Email chain re:		document RE: 5-yr needs
		NYCPRIVO		Commitment to Fair		· ·
247		2828	Deliberative		NP	for HPD Fair Housing Program
247	2	2020	Deliberative	Housing Draft report re: Anti-	INP	Program
						draft of 2010 AFFH
		IVCDDIVO		displacement	46.0	
2.40		NYCPRIVO	A., 61: 15 1:1 .:	strategies;Commitment to	AC &	statement for HUD sent
248	2	2832	Attorney Client; Deliberative	Fair Housing	DPP	to counsel for comments
						draft language for
				- 6		including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
249	2	2859	Deliberative	Housing	DPP	RODRIGUEZ
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
	N	NYCPRIVO		Commitment to Fair	AC &	agencies to submit to
250	2	2885	Attorney Client; Deliberative	Housing	DPP	legal
				Draft report re: Anti-		draft of 2012
				displacement		consolidated plan re:
	N	NYCPRIVO		strategies;Commitment to	AC &	AFFH sent to counsel for
251	2	2897	Attorney Client; Deliberative	Fair Housing	DPP	comments
						draft language for
						including in AFFH
						Consolidated Plan; DO
		NYCPRIVO		Draft report re: Anti-		NOT PRODUCE UNDER
252		2899	Deliberative	displacement strategies	DPP	RODRIGUEZ
	L L	-555	- 5.106146146	and procedure in Strategies	1	

			Final report (non-public)		
			re: Litigation - Anticipated		
			Litigation re: Community		
	NYCPRIV		Preference;Commitment		Excerp AFFH update from
253	2905	Attorney Client; Work Product		NP	2011 consolidated plan
			5		
			Final report (non-public)		
			re: Litigation - Winfield		
	NYCPRIV	o	Litigation;Commitment to		2011 consolidated plan
254	2906	Attorney Client;Work Product	Fair Housing	NP	re: AFFH to HUD
			Final report (non-public)		
			re: Litigation - Anticipated		
			Litigation re: Community		
	NYCPRIV		Preference;Commitment		
255	2911	Attorney Client; Work Product	•	NP	Per City's Agreement
			Draft report re:		draft of 2013
			Neighborhood		consolidated plan re:
	NYCPRIV		Demographics;Commitme	AC &	AFFH sent to counsel for
256	2913	Attorney Client; Deliberative	nt to Fair Housing	DPP	comments
					draft costions for 2012
			Due ft was a st was		draft sections for 2013
	AUVEDDIN		Draft report re:		Consolidated Plan AFFH;
257	NYCPRIV		Commitment to Fair	DDD	DO NOT PRODUCE
257	2924	Deliberative	Housing	DPP	UNDER RODRIGUEZ
					draft langauge for including in AFFH
			Draft report re:		Consolidated Plan; DO
	NYCPRIV	,	Commitment to Fair		NOT PRODUCE UNDER
258	2939	Deliberative	Housing	DPP	RODRIGUEZ
238	2939	Deliberative	riousing	DFF	NODNIGOLZ
			Email chain re: Litigation -		
			Anticipated Litigation re:		
			Community		
			Preference;Litigation -		
			Other;AFFH and		Communication with
		Attorney	Community		attorney re: draft
	NYCPRIV	Client; Deliberative; Work	Preference;Commitment		submission to HUD and
259	2943	Product	to Fair Housing	AC	legal issues re: same
			Final report (non-public)		2007 Final Consolidated
			re: Litigation - Anticipated		Plan AFFH Annual
	NYCPRIV		Litigation re: Community		Performance Report to
260	2953	Attorney Client; Work Product	Preference;((Litigation))	NP	HUD
			e		
			Final report (non-public)		
			re: Litigation - Anticipated		
		Attorney	Litigation re: Community		
	NYCPRIV		Preference;Commitment		Excerp AFFH update from
261	2954	Product	to Fair Housing	NP	2008 consolidated plan
			Dar Character		draft language for
			Draft report re:		including in AFFH
			Neighborhood		Consolidated Plan; DO
3.55	NYCPRIV		Demographics;Commitme	DDC	NOT PRODUCE UNDER
262	2967	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ

						define herebere to think
						draft submission to HUD
				D (t a		re AFFH seeking
		AUVCDDU (O		Draft report re:	W.D. 0	comments of multiple
262		NYCPRIVO	Attaura Cliant Dalihanati	Commitment to Fair	WP &	agencies to submit to
263		2968	Attorney Client; Deliberative	Housing	DPP	legal
						draft submission to HUD
				Due ft was a set was		re AFFH seeking
		ALV CDDIV (O		Draft report re:	VA/D 0	comments of multiple
264		NYCPRIVO	61: . 5 1:1	Commitment to Fair	WP &	agencies to submit to
264		2969	Attorney Client; Deliberative	Housing	DPP	legal
						draft submission to HUD
				D (t		re AFFH seeking
		ALV CDDIV (O		Draft report re:	W.D. 0	comments of multiple
265		NYCPRIVO	61: . 5 1:1	Commitment to Fair	WP &	agencies to submit to
265		2970	Attorney Client; Deliberative	Housing	DPP	legal
				Draft report re:		
		****		Neighborhood		draft of portion of AFFH-
		NYCPRIV0		Demographics;Commitme	AC &	related document sent to
266		2973	Attorney Client; Deliberative	nt to Fair Housing	DPP	counsel for comments
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
267	NYC_0085477	3002	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
268	NYC_0085478	3003	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
270		3015	Deliberative	Housing	DPP	RODRIGUEZ
				Ü		draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
271		3016	Deliberative	Housing	DPP	RODRIGUEZ
		5010	20			draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIVO		Commitment to Fair		NOT PRODUCE UNDER
272		3025	Deliberative	Housing	DPP	RODRIGUEZ
212		3023	Democrative	riousing	DI F	draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIVO		Commitment to Fair	WP &	· ·
272			Attornou Client Deliberation			agencies to submit to
273		3055	Attorney Client; Deliberative	Housing	DPP	legal
				Email chain routitiontic		
				Email chain re: Litigation -		
				Anticipated Litigation re:		
				Community		
				Preference;Litigation -		
				Other;AFFH and		Communication with
			Attorney	Community		attorney re: draft
		NYCPRIV0	Client;Deliberative;Work	Preference;Commitment	AC &	submission to HUD and
274		3070	Product	to Fair Housing	WP	legal issues re: same
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275 3093 Product to Fair Housing WP legal issues re: same draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER ROORIGUEZ 276 3322 Deliberative Housing DPP ROORIGUEZ Water Housing Program; DO NOT PRODUCE UNDER ROORIGUEZ 277 3124 Deliberative Housing DPP ROORIGUEZ 278 3124 Deliberative Housing DPP ROORIGUEZ 279 3126 Deliberative Housing DPP ROORIGUEZ 278 3126 Deliberative Housing DPP ROORIGUEZ 279 Attorney Client; Deliberative Housing DPP ROORIGUEZ 279 Draft report re: Commitment to Fair Housing DPP ROORIGUEZ 280 3149 Deliberative Housing DPP ROORIGUEZ 281 NYC_0085800 3157 Work Product Draft report re: Commitment to Fair Housing DPP ROORIGUEZ 282 3182 Attorney Client; Deliberative Treference: Commitment to Fair Housing DPP ROORIGUEZ 284 Attorney Client; Deliberative Treference: Commitment to Fair Housing DPP ROORIGUEZ 285 NYC_0085800 3157 Work Product Draft report re: Litigation - Anticipated Litigation re: Community Preference DPP ROORIGUEZ 286 Attorney Client; Deliberative Treference; Commitment to Fair Housing DPP ROORIGUEZ 287 NYC_0085800 3157 Work Product Community Preference WP ROORIGUEZ 288 NYC_0085800 3157 Work Product Community Preference WP ROORIGUEZ 289 Attorney Client; Deliberative Draft report re: Community Preference WP ROORIGUEZ 280 3182 Attorney Client; Deliberative Draft report re: Community Preference WP ROORIGUEZ 280 3182 Attorney Client; Deliberative Draft report re: Community Preference WP RooRigues PP P ROORIGUES PP P ROORIGUES PP P P P P P P P P P P P P P P P P P			NIVCDRIVO	•	· ·	AC &	· ·
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284 3202 Attorney Client; Deliberative Housing DPP legal	284		3202	Attorney Client; Deliberative	Housing	DPP	legal

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						draft language for
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				Draft report re:		Consolidated Plan; DO
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285		3212	Deliberative	Housing	DPP	RODRIGUEZ
						draft language for
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		NYCPRIV0		Demographics;Commitme		NOT PRODUCE UNDER
286		3226	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ
				Draft report re:		Draft of information for
				Neighborhood		2012 consolidated plan
		NYCPRIV0		Demographics;Commitme		submitted to attorneys
287	NYC_0085811	3235	Attorney Client; Deliberative	nt to Fair Housing	AC	for advice
				Email chain re: Litigation -		
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			Attorney	Community		attorney re: draft
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288	NYC 0085819	3237	Product	to Fair Housing	WP	legal issues re: same
						draft submission to HUD
						re AFFH seeking
				Draft report re:		comments of multiple
		NYCPRIV0		Commitment to Fair	WP &	agencies to submit to
289		3240	Attorney Client; Deliberative	Housing	DPP	legal
						1-6
						draft of strategic plan for
						2015-2019 and potential
				Draft letter re: Anti-		actions for Consolidated
				displacement		Plan years; DO NOT
		NYCPRIVO		strategies;Commitment to		PRODUCE UNDER
290		3250	Deliberative	Fair Housing	DPP	RODRIGUEZ
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294		3280	Deliberative	Fair Housing	DPP	UNDER RODRIGUEZ

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				Draft talking points re: Anti- displacement		draft of Q&As re: not yet final housing plan sent to
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295		3283	Attorney Client; Deliberative	Fair Housing	DPP	comment
293		3203	Attorney chefit, Deliberative	I all Housing	DFF	Comment
						draft outline concerning
						MIH policy considerations
						and action items; DO
		NYCPRIVO		Draft report re: MIH -		NOT PRODUCE UNDER
296		3284	Deliberative	mobility	DPP	RODRIGUEZ
				Draft talking points re: Anti-		
				displacement		draft Q&A re: 10-year
		NYCPRIVO		strategies;Commitment to		housing plan under
297		3294	Deliberative	Fair Housing	NP	deBlasio and MIH
						communication with
						counsel and others
		NYCPRIV0		Draft Document re: MIH -	AC &	seeking comments on
298		1896	Attorney Client; Deliberative	mobility	DPP	draft document re: MIH
				Final report (non-public)		Strategy slide re: East NY
		NYCPRIV0		re: Anti-displacement		Community Plan and
299	NYC_0080435	3314	Deliberative	strategies	NP	Housing NY
				Draft Internal		draft decision memo to
				Memorandum re: MIH -		mayor re: creation of MIH
				Anti-displacement		program and
		NYCPRIV0		strategies;Application of	AC &	seeking/reflecting legal
300		3319	Attorney Client; Deliberative	Community Preference	DPP	advice
301		NYCPRIVO 3337	Deliberative	Email chain re: 421-a - 2015/2016 revision	DPP	communications re: policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ
				Email chain re:		emails concerning
		NYCPRIVO		Neighborhood		presentation for Oct. 23
302		3347	Deliberative	Demographics	NP	retreat
				Draft report re:		
		NYCPRIV0		Neighborhood		
303		3348	Deliberative	Demographics	NP	Per City's Agreement
				Draft Internal		
				Memorandum re: North		transition memo re:
		NYCPRIV0		Brooklyn Rezoning and		development in various
304		3359	Deliberative	Demographics	NP	neighborhoods
305		NYCPRIVO 3369	Deliberative	Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition	NP	letter from office of comptroller to city planning re: East NY Community plan and MIH
306		NYCPRIVO 3370	Attorney Client;Deliberative	Community Preference	AC & DPP	draft of possible modifications to MIH plan submitted to counsel for advice and comment
		NYCPRIVO		Draft letter re: MIH - Anti- displacement strategies;MIH -		
307		3373	Deliberative	_	NP	Per City's Agreement

				Duest letter us. FNIV Auti		internal dueft letter in
				Draft letter re: ENY - Anti-		internal draft letter in
				displacement		response to comptroller
				strategies;ENY -		concerns re: East NY
				Community		Community plan and
				opposition;ENY -		MIH; produce final; draft
		NYCPRIV0		Investment in		DO NOT PRODUCE
308		3374	Deliberative		DPP	UNDER RODRIGUEZ
				Final letter (non-public) re:		
		NYCPRIV0		Community Opposition		letter from City Counsel
309		3390	Deliberative	Strategies	NP	re: rezoning in Bushwick
				Draft talking points re: ENY		
				- Anti-displacement		
				strategies;ENY -		
				Investment in		
		NYCPRIV0		Communities; Application		
310		3396	Deliberative	of Community Preference	NP	
				Destruction of the		
				Draft talking points re:		presentation to mayor in
		NYCPRIV0		MIH - Anti-displacement		advance for a town hall
311		3406	Deliberative	strategies	NP	meeting
				Final talking points (non-		
				public) re: MIH - Anti-		
				displacement		
		NYCPRIV0		strategies;421-a -		Q&As for meeting on
312		3407	Deliberative	Homeless Preference	NP	senior housing
						draft of East NY
				Draft report re: ENY - Anti-		affordable housing plan
				displacement		seeking public input to
		NYCPRIV0		strategies;ENY -		refine plan for public
313		3410	Deliberative	Community opposition	NP	review
						draft memo including
						recommendations for
						land use, zoning, and
						other matters in
						connection with
						affordable housing in East
		* IV (CD D IV (C		Draft report re:		New York; DO NOT
		NYCPRIV0		Neighborhood		PRODUCE UNDER
314		3413	Deliberative	0 .	DPP	RODRIGUEZ
		NIV(CDD :: 15		Draft report re:		
245		NYCPRIVO	Delihanskin	Neighborhood	DD2	CANAL AC 344
315		3415	Deliberative	Demographics	DPP	SAME AS 314
						highlighted internal
						highlighted internal
						summary of possible
						changes to policies
						affecting affordable
		NIVCDD II (C		Duelt near day A		housing in Crown Heights
246	NIVE COOLETS	NYCPRIVO	Delihanskin	Draft report re: Anti-	DDD	West; DO NOT PRODUCE
316	NYC_0081650	3416	Deliberative		DPP	UNDER RODRIGUEZ
		NIVCDD II (C		Draft report re:		
24-		NYCPRIVO	Delihanskin	Neighborhood	DD2	CANAL AC 344
317		3417	Deliberative	Demographics	DPP	SAME AS 314
		NIVCDD II (C		Draft report re:		
240		NYCPRIVO	Delihanskin	Neighborhood	DDD	CANAL AC 344
318		3418	Deliberative	Demographics	DPP	SAME AS 314

				Droft reserve		1
		• IV (CDD IV (C		Draft report re:		
		NYCPRIV0		Neighborhood		
319		3419	Deliberative	Demographics	DPP	SAME AS 314
				Draft report re:		
		NYCPRIV0		Neighborhood		
320		3420	Deliberative	Demographics	DPP	SAME AS 314
						not conveying legal
		NYCPRIVO		Email chain re: Application		advice or seeking legal
321		3422	Attorney Client	of Community Preference	NP	advice
322						Project briefing memo for
						Hunter's Point South
						development for
						•
						decisionmaking
						concerning affordable
						housing strategies in
						neighborhood; DO NOT
		NYCPRIVO		Draft report re: Application		PRODUCE UNDER
322		3426	Deliberative		DPP	RODRIGUEZ
				·		
						Withdrawing WP; draft of
						Fair Housing Assessment
						Tool outline reflecting
				B - 6		internal thoughts
				Draft presentation re:		regarding how to comply
				Litigation - Anticipated		with 2015 rule change;
		NYCPRIV0	Deliberative;Work Product	Litigation re: Community		DO NOT PRODUCE
323		1910	(withdrawn)	Preference	DPP	UNDER RODRIGUEZ
						draft language for
						including in AFFH
				Draft report re:		Consolidated Plan; DO
		NYCPRIV0		Commitment to Fair		NOT PRODUCE UNDER
324		3430	Deliberative	Housing	DPP	RODRIGUEZ
				Ü		draft language for
				Draft report re: Anti-		including in AFFH
				displacement		Consolidated Plan; DO
		NYCPRIV0		strategies;Commitment to		NOT PRODUCE UNDER
225			Dalibarativa	Fair Housing	DPP	RODRIGUEZ
325		3436	Deliberative	i all Housing	DFF	
						draft language for
						including in AFFH
						Consolidated Plan; DO
		NYCPRIV0		Draft report re: Anti-		NOT PRODUCE UNDER
326		3456	Deliberative	displacement strategies	DPP	RODRIGUEZ
				Final report (non-public)		
		NYCPRIVO		re: Anti-displacement		report on public housing
327		1911	Deliberative	strategies	NP	needs
				Draft report re: Litigation -		
				Anticipated Litigation re:		
				Community		
		NIVCDDIVO		•		
		NYCPRIVO	Maria Bood of	Preference; Application of	NID	D. Cirls A.
328		3478	Work Product	Community Preference	NP	Per City's Agreement

	NYCPRIVO		Draft report re: Anti- displacement strategies; Neighborhood Demographics; Commitme		draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER
329	3481	Deliberative	nt to Fair Housing	DPP	RODRIGUEZ
330	NYCPRIVO 3487	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
331	NYCPRIVO 3499	Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
332	NYCPRIVO 3590	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
			Internal Memorandum re:		
	NYCPRIVO		AFFH and Community		
333	3600	Deliberative	Preference	NP	
333	3000	Deliberative	Treference	INI	draft language for
334	NYCPRIVO 3634	Deliberative	Draft report re: Commitment to Fair Housing	DPP	including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
335	NYCPRIVO 3703	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
336	NYCPRIVO 3710	Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
337	NYCPRIVO 3761	Deliberative	Draft report re:	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
338	NYCPRIVO 3766	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
339	NYCPRIVO 3904	Deliberative	Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ

340	NYCP 2191		perative	Draft report re: MIH - Anti- displacement strategies;MIH - Community opposition	DPP	Draft portion of 10-year housing plan; produce final 10-YEAR PLAN; DO NOT PRODUCE UNDER RODRIGUEZ
341	NYCP 2395		erative	Internal Memorandum re: Litigation - Winfield	NP	Per City's Agreement
342	NYCP 2396		ney Client	Email chain re: Application of Community Preference	NP	not conveying legal advice or seeking legal advice
343	NYCP 2193 NYCP	Delib PRIVO		Draft talking points re: MIH - Anti-displacement strategies;MIH - Community opposition Internal Memorandum re: Anti-displacement strategies;Community Opposition Strategies	NP	draft Q&A on Housing NY and MIH questions for agencies for purposes of HPD affordable housing
344	2200	Dello	erative	Draft Document re: ENY -	NP	planning
	NYCP	- 1		Anti-displacement strategies;ENY - City council input;Application		
345	1952 NYCP 1971	'RIVO	rney Client; Deliberative	Internal Memorandum re: Application of Community	AC &	Per City's Agreement draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
347	NYCP 2261	RIVO	perative;Legislative	Draft talking points re: Anti- displacement strategies	NP	document provided by CM Brad Landers about possible bill protecting tenants from harassment
348	NYCP 2283		erative;Legislative	Draft Internal Memorandum re: Anti- displacement strategies	DPP	decision memo to mayor to guide decision re: Bedford Armory Project; DO NOT PRODUCE UNDER RODRIGUEZ
349	NYCP 2301		ney Client;Legislative	Email chain re: MIH - Community opposition	AC	Withdrawing legislative privilege; communications with counsel and others concerning response to request from CM regarding certain AMI units under MIH policy; reflects legal advice

		П		I		
				Draft Document re: ENY -		
						duelt entire eliminate
	NVC	CPRIVO		Anti-displacement		draft outline of issues to inform decisions re: East
250	2037		Deliberative;Legislative	strategies;Application of Community Preference	NP	New York development
350	203	/	Deliberative, Legislative	Community Preference	INP	New fork development
				Email chain re: Anti-		
					DPP &	
	NVC	PRIVO		displacement strategies; ENY - Anti-displacement		
351	2302	-	Deliberative;Legislative	strategies	Legislat ive	
331	2302	2	Deliberative, Legislative	3ti ategies	ive	communications re: state
						of the city address
	NVC	PRIVO		Email chain re: MIH - Anti-		highlights as talking
352	2040		Deliberative	displacement strategies	NP	points to press
332	2040	.0	Deliberative	Draft talking points re:	INF	points to press
	NVC	PRIVO		421-a - Homeless		
353	2355		Attorney Client; Deliberative	Preference	NP	Per City's Agreement
333		PRIVO	According Chemi, Deliberative	Email chain re: 421-a -	141	TO CITY 3 Agreement
354	2360		Deliberative	Homeless Preference	NP	Per city's Agreement
334	2300	<u> </u>	Democrative	Tiomeless Freierence	. • •	r or only 3 rigiteement
						communication re: East
						Harlem Displacement
						number error in
						connection with
						preparing scope of work
	NYC	PRIVO		Email chain re: Anti-		for RFP; PRODUCE
355	2362		Deliberative	displacement strategies	DPP	UNDER RODRIGUEZ
555			2020.00.10	and productive service Bres		communications re:
						albany housing agenda
						presentation and mayor's
	NYC	PRIVO		Email chain re: Application		talk with Castro about
356	2063	3	Deliberative	of Community Preference	NP	СРР
				·		
				Draft Internal		
				Memorandum re: MIH -		draft decision memo to
				Anti-displacement		mayor re: creation of MIH
			Attorney	strategies; Litigation -		program and
	NYC	CPRIVO	Client;Deliberative;Work	Anticipated Litigation re:	AC &	seeking/reflecting legal
357	2066	6	Product	Community Preference	DPP	advice
						version of proposed bill
						advocated by
						Administation to prevent
					DPP &	Tenant harassment;
		CPRIVO		Draft talking points re: Anti-	Legislat	PRODUCE UNDER
358	2393	3	Deliberative;Legislative	displacement strategies	ive	RODRIGUEZ
				Draft presentation re:		
				Litigation - Anticipated		
			Attorney	Litigation re: Community		draft of document
			Client;Deliberative;Work	Preference;Litigation -	AC &	analyzing settlement
359	2398	8	Product	Winfield Litigation	WP	options
		CPRIVO		Email chain re: Community		
360	3973	3	Attorney Client	Opposition Strategies	NP	Per City's Agreement

		1		I	dueft de sisiere mesere te
			Draft Internal		draft decision memo to
			Memorandum re:		mayor re: creation of MIH
	NYCPRIVO		Commitment to Fair	AC &	program and seeking/reflecting legal
361	2079	Attorney Client; Deliberative		DPP	advice
301	2079	Attorney chefit, Deliberative	Housing Draft talking points re:	DFF	auvice
	NYCPRIVO		Application of Community		
362	2086	Deliberative	Preference	NP	Per City's Agreement
302	2080	Deliberative	rielelelice	INF	draft decision memo to
			Draft Internal		mayor re: creation of MIH
			Memorandum re:		program and
	NYCPRIVO		Commitment to Fair	AC &	seeking/reflecting legal
363	2087	Attorney Client; Deliberative	Housing	DPP	advice
					draft decision memo to
			Draft Internal		mayor re: creation of MIH
			Memorandum re:		program and
	NYCPRIVO		Commitment to Fair	AC &	seeking/reflecting legal
364	2088	Attorney Client; Deliberative	Housing	DPP	advice
		, , , , , , , , , , , , , , , , , , , ,			draft submission to
					receive an award for
					innovations in
					government - public
	NYCPRIV0		Draft Document re: Anti-		engagement unit
365	2412	Deliberative	displacement strategies	NP	submission
			Internal Memorandum re:		
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
366	2487	Work Product	Data Analysis	WP	litigation strategy
			Internal Memorandum re:		0.
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
367	2488	Work Product	Data Analysis	WP	litigation strategy
	NYCPRIV0		Notes re: Litigation -		Analysis for informing
368	2490	Work Product	Winfield Litigation	WP	litigation strategy
			Internal Memorandum re:		
			Litigation - Winfield		
			Litigation;Application of		
			Community		technical notes for
	NYCPRIV0		Preference;Housing		housing study for
369	2491	Deliberative;Work Product	Connect Data Analysis	WP	litigation
			Internal Memorandum re:		
			Litigation - Winfield		
			Litigation;Application of		
			Community		technical notes for
	NYCPRIV0		Preference;Housing		housing study for
370	2493	Deliberative;Work Product	Connect Data Analysis	WP	litigation
					internal deliberations
	NYCPRIV0		Draft report re: Litigation -	WP &	regarding analysis for
371	2496	Deliberative;Work Product	Winfield Litigation	DPP	litigation
			Draft presentation re:		
			Litigation - Winfield		
			Litigation;Application of		
			Community		
	NYCPRIV0		Preference;Housing		
372	2497	Deliberative;Work Product	•	NP	Per City's Agreement
			Draft presentation re:		
			Litigation - Winfield		
	NYCPRIV0		Litigation; Housing Connect		
373	2498	Deliberative;Work Product	Data Analysis	NP	Per City's Agreement
_	•			_	

				Draft report re: Litigation -		
	NYCP	DRIVO		Winfield Litigation; Housing		
374	2501		Deliberative; Work Product		NP	Per City's Agreement
374	2301		Deliberative, Work Froudet	Internal Charts or Maps re:	INF	analysis to inform
	NYCP	PRIVO		Litigation - Winfield	WP &	litigation strategy and
375	2502	_	Deliberative;Work Product	Litigation	DPP	settlement
373	2302		Deliberative, Work Froduct	Draft presentation re:	DIT	Settlement
				Litigation - Winfield		
				Litigation; Application of		
				Community		
	NYCP	PRIVO		Preference;Housing		
376	2504		Deliberative; Work Product		NP	Per City's Agreement
				, , , , , , , , , , , , , , , , , , , ,		i e e e e e e e e e e e e e e e e e e e
						Internal presentation of
						internal study of various
						data conducted to inform
						litigation strategy and
	NYCP	PRIVO		Draft report re: Litigation -	WP &	settlement position in
377	2506		Deliberative; Work Product	Winfield Litigation	DPP	Winfield
				Draft report re: Litigation -		
	NYCP	PRIV0		Winfield Litigation; Housing		
378	2507		Deliberative;Work Product	Connect Data Analysis	NP	Per City's Agreement
				Draft report re: Litigation -		analysis to inform
	NYCP			Winfield Litigation; Housing		litigation strategy and
379	2508		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Draft presentation re:		
				Litigation - Winfield		
				Litigation;Application of		
	AUVCD	ND IV (O		Community		
200	NYCP		Dalihanation Marale Deadors	Preference; Housing	NID	Day Cityla Assessed
380	2510		Deliberative; Work Product	Connect Data Analysis	NP	Per City's Agreement
						Internal presentation of
						internal study of various
						data conducted to inform
				Draft report re: Litigation -		litigation strategy and
	NYCP	PRIVO		Winfield Litigation; Housing	WP &	settlement position in
381	2511		Deliberative;Work Product	Connect Data Analysis	DPP	Winfield
			,	Draft presentation re:		
				Litigation - Winfield		
	NYCP	PRIVO		Litigation; Housing Connect		
382	2513		Deliberative;Work Product	Data Analysis	NP	Per City's Agreement
				Draft report re: Litigation -		analysis to inform
	NYCP			Winfield Litigation;Housing		litigation strategy and
383	2515		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Draft report re: Litigation -		analysis to inform
	NYCP		Dallie and the land	Winfield Litigation; Housing		litigation strategy and
384	2526		Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Draft presentation re:		
				Litigation - Winfield		
				Litigation;Application of		analysis to inform
	NYCP	אואס		Community Preference;Housing	WP &	analysis to inform
385	2527		Deliberative;Work Product	_	DPP	litigation strategy and settlement
აგა	2527		Demberative, WOLK Product	Connect Data Analysis	טרץ	sectienient

			1		
			Internal Charts or Maps re:		
	ALV CDD IV		Litigation - Winfield	W.D. 0	analysis to inform
206	NYCPRIVO		Litigation; Housing Connect		litigation strategy and
386	2536	Deliberative;Work Product	Data Analysis	DPP	settlement
			Dueft usus at us. Litiestica		
	NI/CDDI/(C		Draft report re: Litigation -	M/D 0	analysis to inform
207	NYCPRIVO 2537		Winfield Litigation; Housing	DPP	litigation strategy and settlement
387	2557	Deliberative;Work Product	Connect Data Analysis Internal Charts or Maps re:	DPP	settiement
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	W/D &	litigation strategy and
388	2538	Deliberative;Work Product	Data Analysis	DPP	settlement
300	2538	Deliberative, Work Froduct	Data Allalysis	DFF	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	W/P &	litigation strategy and
389	2540	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
303	2540	Democrative, work froduct	Internal Charts or Maps re:	D11	Settlement
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
390	2542	Deliberative;Work Product	Data Analysis	DPP	settlement
330	25 12		z aca / maryoro		Section City
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
391	2543	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
392	2546	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		
			Winfield		
			Litigation;Application of		
			Community		analysis to inform
	NYCPRIVO		Preference;Housing	WP &	litigation strategy and
393	2558	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
394	2559	Deliberative;Work Product		DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect		litigation strategy and
395	2560	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing		litigation strategy and
396	2575	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft report re: Litigation -		
			Winfield		
			Litigation;Application of		
			Community		analysis to inform
_	NYCPRIVO		Preference; Housing	WP &	litigation strategy and
397	2576	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect		litigation strategy and
398	2577	Deliberative;Work Product	Data Analysis	DPP	settlement

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			Draft report re: Litigation -		
			Winfield		
			Litigation;Application of		
			Community		analysis to inform
	NYCPRIVO		Preference; Housing	WP &	litigation strategy and
399	2578	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
400	2579	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
401	2580	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
		,	Draft Internal		
			Memorandum re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
402	2581	Deliberative;Work Product	Data Analysis	DPP	settlement
702	2301		Draft report re: Litigation -		
			Winfield		
			Litigation; Application of		
			Community		analysis to inform
	NYCPRIVO		•	WP &	
403		Dalibaration March Dood of	Preference; Housing		litigatoin strategy and
403	2582	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Internal Charts or Maps re:		analysis to teles
			Litigation - Winfield	NA/D 0	analysis to inform
	NYCPRIV0		Litigation; Housing Connect		litigation strategy and
404	2583	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIV0		Winfield Litigation;Housing		litigation strategy and
405	2584	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIV0		Winfield Litigation; Housing	WP &	litigation strategy and
406	2585	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIV0		Winfield Litigation; Housing	WP &	litigation strategy and
407	2586	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			Draft report re: Litigation -		
			Winfield		
			Litigation;Application of		
			Community		analysis to inform
	NYCPRIVO		Preference; Housing	WP &	litigation strategy and
408	2587	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
		,	Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
409	3974	Deliberative;Work Product	Data Analysis	DPP	settlement
703	3374	Schoeradive, Work Frounct	Draft report re: Litigation -	١ ، د	Jean Chieff
			Winfield		
			Litigation; Application of		analysis to inform
	AUVCDE" (2		Community	MAID C	analysis to inform
	NYCPRIVO	D 11	Preference; Housing	WP &	litigation strategy and
410	2588	Deliberative;Work Product	Connect Data Analysis	DPP	settlement

				Draft report re: Litigation -		
				Winfield		
				Litigation;Application of		
				Community		analysis to inform
		NYCPRIV0		, 0	WP &	litigation strategy and
411		2589	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Dueft was and was distinguished		analista infass
		NIVCDDII (O		Draft report re: Litigation -	M/D 0	analysis to inform
442		NYCPRIVO	Baltha and a Maril Barahari	Winfield Litigation; Housing		litigation strategy and
412	· ·	2590	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Draft report re: Litigation -		analysis to inform
		NYCPRIVO		Winfield Litigation; Housing	۱۸/D <i>و</i> .	litigation strategy and
413		2591	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
413		2331	Deliberative, Work Froduct	Confident Data Analysis	DFF	Settlement
				Draft report re: Litigation -		analysis to inform
		NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
414		2592	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
			2,112	2.2.2.2.2.3.4.0.4		
				Draft report re: Litigation -		analysis to inform
		NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
415		2593	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Internal Charts or Maps re:		
				Litigation - Winfield		analysis to inform
		NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
416	:	2595	Deliberative;Work Product	Data Analysis	DPP	settlement
				Draft report re: Litigation -		analysis to inform
	I	NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
417	1	2596	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
				Internal Charts or Maps re:		
				Litigation - Winfield		analysis to inform
		NYCPRIVO		Litigation;Housing Connect		litigation strategy and
418	1	2597	Deliberative;Work Product	Data Analysis	DPP	settlement
				Internal Charts or Maps re:		
				Litigation - Winfield		analysis to inform
		NYCPRIV0		Litigation; Housing Connect		litigation strategy and
419		2602	Deliberative;Work Product	Data Analysis	DPP	settlement
				Draft ranget var litigation		analysis to inform
	.	NVCDDIVO		Draft report re: Litigation - Winfield Litigation; Housing	\A/D 0	analysis to inform
420		NYCPRIVO 2605	Deliberative;Work Product	Connect Data Analysis	WP & DPP	litigation strategy and settlement
420		2003	Democrative, WOLK Ploudet	Connect Data Analysis	DF F	Settienient
				Draft report re: Litigation -		analysis to inform
		NYCPRIVO		Winfield Litigation; Housing	WP &	litigation strategy and
421		2606	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
721				Internal Charts or Maps re:		
				Litigation - Winfield		analysis to inform
		NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
422		2610	Deliberative;Work Product	Data Analysis	DPP	settlement
			,	Internal Charts or Maps re:		
				Litigation - Winfield		analysis to inform
		NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
423		2611	Deliberative;Work Product	Data Analysis	DPP	settlement
				Internal Charts or Maps re:		
				Litigation - Winfield		analysis to inform
		NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
424		2612	Deliberative;Work Product	Data Analysis	DPP	settlement
727			i	,		

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			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
425	2613	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
426	2614	Deliberative;Work Product	Data Analysis	DPP	settlement
0			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	\A/D 2.	litigation strategy and
427	2615	Dalibarativa Mark Bradust	Data Analysis	DPP	settlement
427	2015	Deliberative;Work Product	,	DPP	settiement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV0		Litigation; Housing Connect		litigation strategy and
428	2617	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV0		Litigation; Housing Connect	WP &	litigation strategy and
429	2619	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
430		Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	۱۸/D <i>و</i> .	litigation strategy and
431	2621	Deliberative;Work Product	Data Analysis	DPP	settlement
451	2021	Deliberative, Work Froduct	Internal Charts or Maps re:	DFF	Settlement
					analysis to inform
	ALV CORDIVO		Litigation - Winfield	\A/D 0	analysis to inform
	NYCPRIV0		Litigation; Housing Connect		litigation strategy and
432	2622	Deliberative;Work Product	Data Analysis	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		analysis to inform
	NYCPRIV0		Litigation; Housing Connect		litigation strategy and
433	2655	Deliberative;Work Product	Data Analysis	DPP	settlement
			Draft report re: Litigation -		analysis to inform
	NYCPRIV0		Winfield Litigation; Housing	WP &	litigation strategy and
434	2656	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
					analysis to inform
	NYCPRIVO		Draft report re: Litigation -	WP &	litigation strategy and
435		Deliberative;Work Product	Winfield Litigation	DPP	settlement
		,	Draft Document re:		
			Litigation - Winfield		analysis to inform
	NYCPRIVO		Litigation; Housing Connect	WP &	litigation strategy and
436		Deliberative;Work Product	Data Analysis	DPP	settlement
430	2030	Senserative, Work Froudet	Draft Document re:	J. 1	Sectionicit
			Litigation - Winfield		
			Litigation;AFFH and		1
			Community		analysis to inform
	NYCPRIV0		Preference; Housing	WP &	litigation strategy and
437	2659	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
					framework for analysis to
	NYCPRIV0		Draft report re: Litigation -	WP &	inform litigaton strategy
438	2660	Deliberative;Work Product	Winfield Litigation	DPP	and settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
439		Deliberative;Work Product	Litigation	DPP	settlement
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			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
440	2669	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
441	2670	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
442	2671	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
443	2672	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
	NYCPRIV0		Litigation - Winfield		Analysis for informing
444	2673	Work Product	Litigation	WP	litigation strategy
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
445	2674	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
446	2676	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
	NYCPRIVO		Litigation - Winfield		Analysis for information
447	2679	Work Product	Litigation	WP	litigation strategy
			Internal Charts or Maps re:		0,
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
448	2680	Work Product	Data Analysis	WP	litigation strategy
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
449	2681	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
450	2682	Deliberative;Work Product	Litigation	DPP	settlement
.50	2002	2 emperative, it emit to adde	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
451	2686	Deliberative;Work Product	Litigation	DPP	settlement
431	2000	Denocrative, Work Froduct	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
452	2687	Deliberative;Work Product	Litigation	DPP	settlement
432	2007	Deliberative, Work Froduct	Internal Charts or Maps re:	DII	Settlement
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
453		Work Product	Data Analysis	WP	litigation strategy
133	2032		Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
454	2695	Deliberative;Work Product	Litigation	DPP	settlement
.51	2033		Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
455	2696	Deliberative;Work Product	Litigation	DPP	settlement
133	2330		Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
456	2700	Deliberative;Work Product	Litigation	DPP	settlement
730	2700	2 cm 2 crative, work i roudet	Internal Charts or Maps re:		analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
457	2701	Deliberative;Work Product	Litigation	DPP	settlement
437	2701	Democrative, Work Froudt	Internal Charts or Maps re:	DI F	analysis to inform
	NYCPRIVO		Litigation - Winfield	WP &	litigation strategy and
1 E0	2702	Deliberative;Work Product	Litigation - Willield	DPP	settlement
458	2702	Demberative, Work Product	Liugation	ארע	settienient

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			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
459	2703	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		analysis to inform
	NYCPRIV0		Litigation - Winfield	WP &	litigation strategy and
460	2704	Deliberative;Work Product	Litigation	DPP	settlement
			Internal Charts or Maps re:		
			Anti-displacement		analysis to inform
	NYCPRIV0		strategies; Litigation -	WP &	litigation strategy and
461	2746	Deliberative;Work Product	Winfield Litigation	DPP	settlement
			Internal Charts or Maps re:		
			Litigation - Winfield		
			Litigation;AFFH and		
			Community		
	NYCPRIV0		Preference;Housing		Analysis for informing
462	2747	Work Product	Connect Data Analysis	WP	litigation strategy
			Internal Charts or Maps re:		
			Litigation - Winfield		draft data analysis to
	NYCPRIVO	B 19	Litigation;AFFH and		inform litigation strategy
463	2748	Deliberative	Community Preference	WP	and settlement
			Darft and a 1991 at		
	NIV(CDD II) (C		Draft report re: Litigation -	M/D 0	analysis to inform
464	NYCPRIVO	Daliha wati wa Mka uli Dua di sat	Winfield Litigation; Housing		litigation strategy and
464	2749	Deliberative;Work Product	Connect Data Analysis	DPP	settlement
					describes housing and
					neighborhood study
					conducted for purposes
			Final report (non-public)		of evaluating impact of subsidized housing on
					health and well being and
			re: Application of		_
	NIVCDBIVO		Community		school performance; PRODUCE UNDER
465	NYCPRIVO 2760	Daliborativo	Preference; Housing	DDD	RODRIGUEZ
465	2700	Deliberative	Connect Data Analysis	DPP	KODKIGUEZ
			Notes re: Litigation -		
	NYCPRIVO		Winfield Litigation; Housing		Analysis for informing
466	2753	Work Product	Connect Data Analysis	WP	litigation strategy
400	2/33	VVOIK FIOUUCL	Confiect Data Allalysis	VVF	inigation strategy
					Analysis for informing
			Draft Document re:		litigation strategy; in
			Litigation - Winfield		anticipation of litigation;
	NYCPRIVO		Litigation; Housing Connect		FOIL request from
467	2754	Work Product	Data Analysis	WP	plaintiff's counsel
407	2754		2 4 4 4 1 1 4 1 7 1 1 5 1 5		p.a.min 5 counser
			Notes re: Litigation -		created to respond to
	NYCPRIVO		Winfield Litigation; Housing		FOIL request made by
468		Work Product	Connect Data Analysis	WP	Gurion
700	3330				
	NYCPRIV0		Draft report re: Litigation -		Analysis for informing
469		Work Product	Winfield Litigation	WP	litigation strategy
			Draft Internal		decision memo to mayor
			Memorandum re:		re: MIH
	NYCPRIVO		Commitment to Fair	AC &	seeking/reflecting legal
470		Attorney Client; Deliberative	Housing	DPP	advice
		-,,	0	L	1

			Draft latter re: Anti		
			Draft letter re: Anti-		Dog fi latter for a Maria
			displacement		Draft letter from Mayor
	NYCPRIV0		strategies;421-a -		to constituents re:
471	3991	Deliberative	Homeless Preference	NP	affordable housing
472	NYCPRIVO 3992	Attorney Client;Deliberative	Draft Internal Memorandum re: MIH - Anti-displacement strategies;Application of Community Preference	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
473	NYCPRIVO 3998	Deliberative	Draft report re: MIH - Anti- displacement strategies; Application of Community Preference	DPP	Decision memo to mayor re: how to engage with private applications subject to MIH at Barnett Ave.; DO NOT PRODUCE UNDER RODRIGUEZ
474	NYCPRIVO 4004	Deliberative	Final letter (non-public) re: MIH - Anti-displacement strategies;ENY - Anti- displacement strategies	NP	produce; same as 310
					draft Q&As re:
475	NYCPRIVO 4007	Deliberative	Draft talking points re: Anti- displacement strategies	NP	afffordable housing in connection with 2015 mayor state of city address
476	NYCPRIVO 4016	Attorney Client	Draft report re: Anti- displacement strategies;ENY - Anti- displacement strategies	AC	communication from attorney summarizing thoughts and next steps on affordable housing in specific neighborhood
477	NYCPRIVO 4082	Attorney Client;Deliberative	Email chain re: Anti- displacement strategies;Commitment to Fair Housing	DPP	communication re: draft RFP for HRA program reflecting comments and revisions; DO NOT PRODUCE UNDER RODRIGUEZ
478	NYCPRIVO 4088	Attorney Client; Deliberative	Draft report re: Anti- displacement strategies; Commitment to Fair Housing	AC	attorney comments and revisions to anti- harassment tenant protection program RFP
173	.000		11000116		p. stooton p. ogram m
479	NYCPRIVO 4089	Deliberative	Email chain re: Anti- displacement strategies	NP	communications re: draft press release for legal services for tenants
480	NYCPRIVO 4090	Attorney Client;Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	AC	attorney comments and revisions to anti- harassment tenant protection program RFP

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					attornov comments and
			Draft roport ro		attorney comments and revisions to anti-
	NYCPRIVO		Draft report re: Commitment to Fair		
481	4107	Deliberative	Housing	AC	harassment tenant protection program RFP
401	4107	Deliberative	Draft talking points re: Anti-	AC	testimony of Jordan
			displacement		Dressler before NYC
	NYCPRIVO		strategies;Commitment to		Council committee on
482	4114	Deliberative	Fair HousingNP	NP	2017 budget
402	7117	Benberanve	Draft Internal	141	2017 budget
			Memorandum; Notes re:		
			Anti-displacement		
			strategies; Litigation -		
			Anticipated Litigation re:		
			Community		Research for informing
	NYCPRIVO		Preference;Litigation -		litigation strategy and
483	2432	Work Product	Winfield Litigation	WP	settlement position
103	2132		William Engacion	•••	Section position
			Draft report;Internal		
			Charts or Maps re:		
			Litigation - Winfield		
	NYCPRIVO		Litigation; Application of	WP &	discussing settlement
484	2433	Deliberative; Work Product	Community Preference	DPP	options in this case
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			Communication
					concerning topic for
			Email chain; Notes re: 421-		which legal advice is
			a - Homeless		sought re: application of
	NYCPRIVO		Preference;Application of		CPP a certain lottery
485	2434	Attorney Client; Deliberative	Community Preference	AC	applicant
			·		
	NYCPRIVO		Draft report re: Litigation -		Atty questions re: CPP
486	2436	Work Product	Winfield Litigation	WP	and statistical tests
			Internal Charts or Maps re:		
			Litigation - Anticipated		
			Litigation re: Community		analysis to inform
	NYCPRIV0		Preference;Litigation -	WP &	litigation strategy and
487	2440	Deliberative;Work Product	Winfield Litigation	DPP	settlement
					notes discussing
	NYCPRIV0		Notes re: Litigation -	WP &	settlement options in this
488	2442	Deliberative;Work Product	Winfield Litigation	DPP	case
			Internal Charts or Maps re:		
			Litigation - Winfield		
	NYCPRIVO		Litigation; Housing Connect		Analysis for informing
489	2443	Work Product	Data Analysis	WP	litigation strategy
			Lateral Charles		
			Internal Charts or Maps re:		
			Litigation - Anticipated		
	AUVCDD 11 CO		Litigation re: Community	MAD C	analysis to inform
	ו אי אומנו. אאוו		Preference; Litigation -	WP &	litigation strategy and settlement
400	NYCPRIVO				CATTIAMANT
490	2444	Deliberative;Work Product	Winfield Litigation	DPP	Settlement
490		Deliberative; Work Product		DPP	Settlement
490		Deliberative;Work Product	Draft report;Notes re:	DPP	settlement
490		Deliberative;Work Product	Draft report;Notes re: Litigation - Anticipated	DPP	settlement
490	2444	Deliberative;Work Product	Draft report; Notes re: Litigation - Anticipated Litigation re: Community		
490		Deliberative; Work Product Deliberative; Work Product	Draft report;Notes re: Litigation - Anticipated	WP &	notes discussing metrics for analysis in case

NY 492 24	CPRIVO 46 Delibe	rative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
NY 493 24-	CPRIVO 47 Delibe	rative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	description of studies about gentrification & displacement relevant to case analysis
NY 494 24	CPRIVO 49 Delibe	rative;Legislative	Notes re: 421-a - Homeless Preference	DPP	Internal working notes reflecting questions/considerations in determining implementation of certain preferences; DO NOT PRODUCE UNDER RODRIGUEZ
NY 495 245	CPRIVO 53 Delibe	rative	Draft talking points;Draft Document re: Anti- displacement strategies	NP	notes on draft talking points about Inwood Neighborhood study
NY 496 24:	CPRIVO 54 Delibe	rative	Notes;Internal Memorandum re: Community Opposition Strategies	DPP	notes from neighborhood strategies team meeting about preserving housing; reflects internal discussions about policy strategies; DO NOT PRODUCE UNDER RODRIGUEZ
NY 497 41:	CPRIVO 18 Delibe	rative	Notes re: Anti- displacement strategies	DPP	action steps and strategies related to homeless prevention policy; DO NOT PRODUCE UNDER RODRIGUEZ
NY 498 248	CPRIVO 81 Work I	Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
NY 499 248		Deliberative;Work	Notes;Draft Document re: Litigation - Winfield Litigation;Commitment to Fair Housing	NP	Per City's Agreement (except p. 5 which are attorney notes)
NY 500 244	CPRIVO 85 Work I	Product	Draft Document re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies